Appendix P

Documentation of Exceedance/
Near Exceedance Notifications

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **8/3/2011**

I. Identification of : **X** ***Exceedance*** _____ ***Near Exceedance***

Environmental Monitoring Parameter:

_____ Particulate Dust **x** PCBs in Air _____ VOCs

Date of Exceedance/Near Exceedance : 7/26/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:21 am on7/26/11 to 7:18 am on 7/27/11 from Air Station #1.

Analytical Result (or measurement): 0.111 ug/m^3 ***Action Level*** .11 ug/m3 (evaluation level)

What was the cause (nature) and location of the exceedance or near exceedance?
The exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. On the day the air sample was being collected, Brandenburg was loading soil into intermodal containers at cell #3. A total of 5 containers were loaded with PCB-containing soil from cell #3 during the day. Air monitoring station #1 is approximately 400-feet away from where the loading occurred. Based on data and wind direction work activities at the Cell 3 loading area are the likely source of of the exceedance.

Brandenburg Representative Notified: Jason Ganun
Date: 8/3/2011 *Time:* 9:15 AM

USEPA (or other regulatory agency) Representative(s) Notified: Dino Zack
Date: 8/3/2011 *Time:* 9:20 AM

Immediate Action(s) Required: _____ *Yes* X *No*

II. Corrective Action(s)

Short Term Action Taken:
After notification Brandenburg will institute the following corrective actions: 1). management of the soil pile covers to keep the side of the poly exposed to the soil pile face down, 2). covering the soil pile sooner with the onset of a storm 3). operation shutdown with sustained winds grater than 25 mph, and 4) increased watering of piles and/or roadway.

Long Term Action Taken:
Monitoring to ensure response actions are successful.

Date of Action: 8/3/2011 *Confirmed by:* _____

III. Verification of Corrective Action(s)

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)
1	AIR1-171264	7/8/2011	262	1462	382,488.9	0.07	0.11	0.0040 J,AP
2	AIR2-165559	7/8/2011	260	1453	377,394.5	0.07	0.11	0.0072 AP
3	AIR3-171268	7/8/2011	254	1421	361,621.8	0.07	0.11	0.0032 J,AP
4	AIR1-171254	7/9/2011	265	1438	381,565.5	0.07	0.11	0.0070 AP
5	AIR2-165557	7/9/2011	213	1428	303,542.7	0.07	0.11	0.0051 J,AP
6	AIR3-171267	7/9/2011	262	1471	384,769.1	0.07	0.11	0.0031 J,AP
7	AIR1-165560	7/12/2011	257	1439	369,556.9	0.07	0.11	0.0141 AP
8	AIR2-165558	7/12/2011	126	1448	181,953.3	0.07	0.11	0.0055 J,AP
9	AIR3-171263	7/12/2011	251	1426	357,460.0	0.07	0.11	0.0106 AP
10	AIR1-171252	7/13/2011	260	1436	373,433.1	0.07	0.11	0.0159 AP
11	AIR2-171269	7/13/2011	383	1426	314,869.3	0.07	0.11	0.0072 AP
12	AIR3-171253	7/13/2011	253	1437	363,563.4	0.07	0.11	0.0057 J,AP
13	AIR1-171257	7/14/2011	267	1445	385,359.3	0.07	0.11	0.0096 AP
14	AIR2-171262	7/14/2011	257	1413	363,555.1	0.07	0.11	0.0065 AP
15	AIR3-171259	7/14/2011	259	1430	369,995.1	0.07	0.11	0.0055 J,AP
16	AIR1-07152011	7/15/2011	268	1432	384,244.4	0.07	0.11	0.0090 AP
17	AIR2-07152011	7/15/2011	259	1428	369,643.5	0.07	0.11	0.0078 AP
18	AIR3-07152011	7/15/2011	264	1435	378,258.4	0.07	0.11	0.0065 J,AP
19	AIR1-07162011	7/16/2011	259	1913	495,147.6	0.07	0.11	0.0060 AP
20	AIR2-07162011	7/16/2011	257	1911	490,505.0	0.07	0.11	0.0043 J,AP
21	AIR3-07162011	7/16/2011	261	1915	500,307.6	0.07	0.11	0.0041 J,AP
22	AIR4-07162011	7/16/2011	N/A	N/A	405,641.8*	0.07	0.11	ND
23	AIR1-07192011	7/19/2011	260	1449	377,311.6	0.07	0.11	0.0182 AP
24	AIR2-07192011	7/19/2011	253	1451	367,385.7	0.07	0.11	0.0113 AP
25	AIR3-07192011	7/19/2011	266	1441	383,005.0	0.07	0.11	0.0066 J,AP
26	AIR1-07202011	7/20/2011	253	1448	365,727.4	0.07	0.11	0.0117 AP
27	AIR2-07202011	7/20/2011	254	1450	367,817.3	0.07	0.11	0.0064 J,AP
28	AIR3-07202011	7/20/2011	255	1434	365,451.3	0.07	0.11	0.0050 J,AP
29	AIR1-07212011	7/21/2011	258	1420	365,798.5	0.07	0.11	0.0360 AP
30	AIR2-07212011	7/21/2011	251	1420	357,119.4	0.07	0.11	0.0045 J,AP
31	AIR3-07212011	7/21/2011	248	1435	356,331.4	0.07	0.11	0.0207 AP
32	AIR1-07222011	7/22/2011	256	1430	366,077.4	0.07	0.11	0.0350 AP
33	AIR2-07222011	7/22/2011	249	1434	357,074.8	0.07	0.11	0.0147 AP
34	AIR3-07222011	7/22/2011	249	1436	357,457.2	0.07	0.11	0.0106 AP
35	AIR4-07222011	7/22/2011	N/A	N/A	358,562.1	0.07	0.11	ND
36	AIR1-07232011	7/23/2011	236	1963	462,732.0	0.07	0.11	0.0250 AP
37	AIR2-07232011	7/23/2011	239	1960	467,956.9	0.07	0.11	0.0111 AP
38	AIR3-07232011	7/23/2011	239	1936	462,294.8	0.07	0.11	0.0092 AP
39	AIR1-07262011	7/26/2011	263	1445	379,621.8	0.07	0.11	0.0422 AP
40	AIR2-07262011	7/26/2011	253	1439	364,634.1	0.07	0.11	0.0095 J,AP
41	AIR3-07262011	7/26/2011	263	1439	378,607.4	0.07	0.11	0.0177 AP
42	AIR1-07272011	7/27/2011	259	1437	371,580.1	0.07	0.11	0.1110 AP
43	AIR2-07272011	7/27/2011	253	1435	363,657.2	0.07	0.11	0.0246 AP
44	AIR3-07272011	7/27/2011	261	1428	372,563.7	0.07	0.11	0.0239 AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

ND = Not Detected above laboratory reporting limit

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-07272011

GC Semivolatiles

Lot-Sample #...: H1G280424-001 **Work Order #...:** MK8GV1AA **Matrix.....:** AA
Date Sampled...: 07/27/11 **Date Received..:** 07/28/11
Prep Date.....: 07/28/11 **Analysis Date..:** 08/01/11
Prep Batch #...: 1209075
Dilution Factor: 13.46 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.061	ug/m3
Aroclor 1221	ND	0.027	ug/m3
Aroclor 1232	ND G	0.10	ug/m3
Aroclor 1242	**0.078 AP**	**0.027**	**ug/m3**
Aroclor 1248	**0.033 AP**	**0.027**	**ug/m3**
Aroclor 1254	ND	0.027	ug/m3
Aroclor 1260	ND	0.027	ug/m3
Aroclor 1262	ND	0.027	ug/m3
Aroclor 1268	ND	0.027	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection July 26, 2011
Site Weather Conditions Broken Cloud, 63 - 78°F, Predominate wind direction: S, Afternoon high wind 32 mph
General Site Notes
1) Elevated readings at WP-1 resulted from trucks waitng on ramp to be loaded.
2) Elevated readings at SP-2 resulted from vehicle traffic from workers at the pump house.
3) Elevated readings at WP-2 resulted from dust generated while wetting down stock piles.
4) In all cases, conditions were addressed with water. No 15 minute TWA was exceeded.

NM = Not Measured

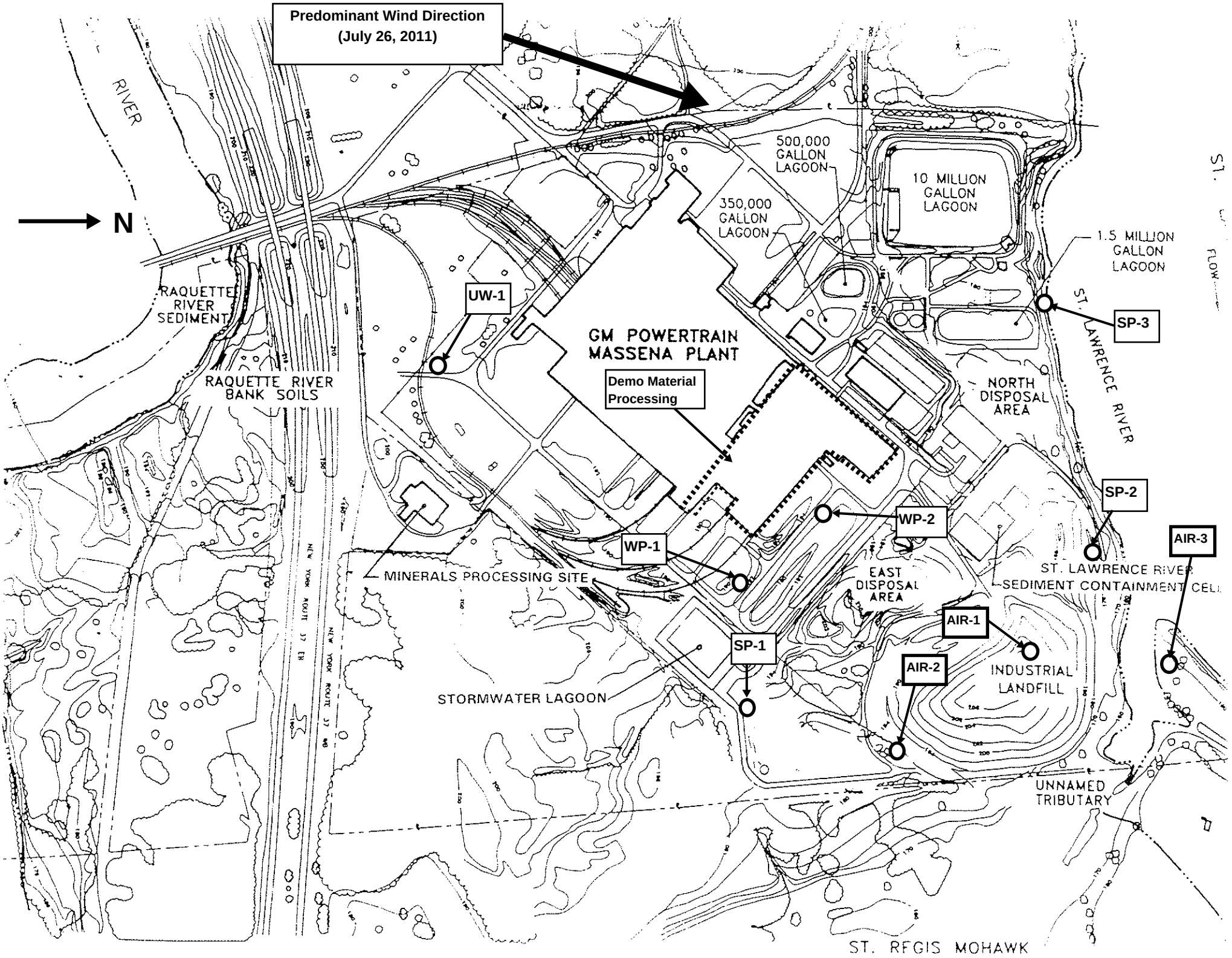
CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	24	0.0
Minimum Instantaneous	4	0.0
Maximum Instantaneous	33	0.0
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	44	0.2
Minimum Instantaneous	6	0.0
Maximum Instantaneous	130	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	41	0.3
Minimum Instantaneous	6	0.0
Maximum Instantaneous	136	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	24	0.4
Minimum Instantaneous	5	0.0
Maximum Instantaneous	44	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	34	0.1
Minimum Instantaneous	2	0.0
Maximum Instantaneous	104	0.2
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	24	0.3
Minimum Instantaneous	5	0.0
Maximum Instantaneous	32	0.3
AIR-1		
Maximum 15 Minute TWA	41	NM
Minimum Instantaneous	4	NM
Maximum Instantaneous	58	NM
AIR-2		
Maximum 15 Minute TWA	27	NM
Minimum Instantaneous	5	NM
Maximum Instantaneous	30	NM
AIR-3		
Maximum 15 Minute TWA	32	NM
Minimum Instantaneous	14	NM
Maximum Instantaneous	42	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.
>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.
>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
(July 26, 2011)
N
RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
UW-1
500,000 GALLON LAGOON
350,000 GALLON LAGOON
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
SP-3
ST. LAWRENCE RIVER
GM POWERTRAIN MASSENA PLANT
Demo Material Processing
NORTH DISPOSAL AREA
SP-2
WP-2
WP-1
AIR-3
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT CELL
AIR-1
SP-1
AIR-2
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
ST. REGIS MOHAWK

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-07262011-00094 **Date:** July 26, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (38)
Subcontractors: Op-Tech (1)
Heritage (2)
Perras (2)

Weather/Wind Overcast/ PM Thunderstorms 63 to 78 degrees F. Wind out of the S 5 to 14 mph gusting to 32 mph.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- .Protecting and enforcing the requirements for the TSCA exclusion zone continues. The establishment of a load out on column 29 presents a tempting exit. Everyone that enters the exclusion zone must do so at the decon area at door #48 and exit the same. Signing in and out and PPE is a requirement for all personnel accessing this area.
- Prior to eating, drinking and smoking employees must wash their hands. Good hygiene is essential for good health.
- The growing piles presents a hazard to traffic on the demolition floor. Loaders and truck traffic must reduce speed and keep a sharp eye out when navigating through demolition floor.

Work Activities Summary:

Brandenburg

- Wire stripping activity inside door #42.
- Burners continue to size material in burning field at the east end of plant. This is a designated burning field.
- Continued sizing building structure at column 29 inside TSCA area with hydraulic shear.
- Wrecking low bay structure at column line 19/17 from J to F in TSCA area.
- Wrecking high bays at column line N/M from 17 to 13 and 17/15 from N to L. TSCA steel segregated to TSCA area.
- Loaded soil into intermodal containers. Loaded 5 containers with soil.
- Loaded debris into intermodal containers. Loaded 8 containers.
- Detailed cleaning of material for visual inspection at Q / P line. Cutting off piping extruding through concrete floor.
- Torch cutting material in TSCA area to size for landfill requirements.
- Two shears prepping P&S and #1 iron in lay down area.
- Loaded four 100 cu yd trailers with C&D.
- Sorting metals from C&D piles with grapple and magnet.
- Shipped three loads of clean transformers out for recycling. Total of 11 transformers

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Op-Tech

- Oversight of roofing material removal.
- Clean up at Q/P line includes asbestos containing material.

Heritage

- Rotating intermodal containers for Brandenburg to load at Cell #3 and TSCA debris load out at column line 29 on demolition floor.
- Loaded one railcar with seven intermodal containers. Rail car was manifested and inspected.

Perras

- Two Perras employees driving yard trucks and tarping loads for Heritage.

Waste Materials Removed:
Four loads of C&D was shipped via 100 cy yd trailers from site and disposed of at Ontario County Landfill. Two BISCO dump trailers loaded with bailing material shipped to Ben Wiesman scrap yard in Owego, NY. One CSX and three BISX railcars with prepared P&S still out at main line to be shipped to Ameristeel. Three loads of clean transformers shipped on flat bed trailers to TSI in Concord, NH.
No empty rail cars or intermodal containers on site.

Samples Collected, Requested/Received Analytical Results:
Wipe samples collected for equipment that was decontaminated in the TSCA exclusion zone. Samples include three light towers on rent from United Rentals and one skid steer bucket that previously failed to meet decontamination levels.

Issues and Concerns:
Lack of rail cars

Resolutions to Issues and Concerns:
Working out issues with CSX to get regular service.

Potential Delays:
None determined at this time.

Supplemental Information:

- See Brandenburg Daily Log (attached) for additional details of site activities.
-

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RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: 8/17/2011

I. Identification of : X ***Exceedance*** _____ ***Near Exceedance***

Environmental Monitoring Parameter:

_____ Particulate Dust x PCBs in Air _____ VOCs

Date of Exceedance/Near Exceedance : 8/10/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:22 am on 8/10/11 to 7:10 am on 8/11/11 from Air Station #1.

Analytical Result (or measurement): 0.134 ug/m^3 ***Action Level*** .11 ug/m3 (action level)

What was the cause (nature) and location of the exceedance or near exceedance?

The exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. On the day this air sample was collected, Brandenburg was loading soil into intermodal containers at cell #3. A total of 17 containers were loaded with PCB-containing soil from cell #3 during the day. Air monitoring station #1 is approx. 400-feet away from where the loading occurred. This exceedance is very similar to previous exceedance on 7/26/11 in that higher gusts of wind > 25 mph were logged at the end of the day from 4:15 pm to 4:45 pm during shutdown of operations (covering of piles). Based on the data and wind direction, the work activities at Cell #3 again are the likely source of the exceedance.

Brandenburg Representative Notified: *Mike Massiello and John Williams*
Date: 8/17/2011 *Time:* 5:00 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack and Anne Kelly*
Date: 8/17/2011 *Time:* 4:40 PM

Immediate Action(s) Required: ***X*** *Yes* _____ *No*

II. Corrective Action(s)

Short Term Action Taken:

In addition to Brandenburg instituting the corrective actions from the previous exceedance: 1). management of the soil pile covers keep the side of the poly exposed to the soil pile face down, 2). covering the soil pile sooner with the onset of a storm, 3). operation shutdown with sustained winds grater than 25 mph, and 4) increased watering of piles and/or roadway. Additional measures include: 5). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and 6). Erect a wind sock near soil pile load-out area to better identify the wind gusts.

Long Term Action Taken:

Date of Action: _____ *Confirmed by:* *Richard Boelter*

III. Verification of Corrective Action(s)

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
59	AIR3-08052011	8/5/2011	260	1189	309,446.4	0.07	0.11	0.0057 J,AP
60	AIR4-08052011	8/5/2011	N/A	N/A	354,853.1	0.07	0.11	ND
61	AIR1-08062011	8/6/2011	243	2037	495,148.7	0.07	0.11	0.0187 AP
62	AIR2-08062011	8/6/2011	236	2037	481,660.6	0.07	0.11	0.0064 AP
63	AIR3-08062011	8/6/2011	236	1996	471,534.8	0.07	0.11	0.0067 AP
64	AIR1-08092011	8/9/2011	278	1453	403,265.5	0.07	0.11	0.0069 AP
65	AIR2-08092011	8/9/2011	282	1453	409,820.8	0.07	0.11	0.0052 J,AP
66	AIR3-08092011	8/9/2011	262	1440	377,097.8	0.07	0.11	0.0027 J,AP
67	AIR1-08102011	8/10/2011	267	1432	381,739.0	0.07	0.11	0.0135 AP
68	AIR2-08102011	8/10/2011	283	1433	405,673.2	0.07	0.11	0.0070 AP
69	AIR3-08102011	8/10/2011	270	1425	384,611.1	0.07	0.11	0.0062 J,AP
70	AIR1-08112011	8/11/2011	279	1428	398,989.8	0.07	0.11	0.134 AP
71	AIR2-08112011	8/11/2011	286	1420	406,765.8	0.07	0.11	0.0117 AP
72	AIR3-08112011	8/11/2011	269	1432	385,317.3	0.07	0.11	0.0304 AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

ND = Not Detected above laboratory reporting limit

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-08112011

GC Semivolatiles

Lot-Sample #...: H1H120402-001	**Work Order #...:** MLK4G1AA	**Matrix.....:** AA
Date Sampled...: 08/11/11	**Date Received..:** 08/12/11	
Prep Date.....: 08/12/11	**Analysis Date..:** 08/16/11	
Prep Batch #...: 1224080		
Dilution Factor: 12.53	**Method.....:** EPA-2 TO-4A	

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.065	ug/m3
Aroclor 1221	ND	0.025	ug/m3
Aroclor 1232	ND G	0.11	ug/m3
Aroclor 1242	**0.098 AP**	**0.025**	**ug/m3**
Aroclor 1248	**0.036 AP**	**0.025**	**ug/m3**
Aroclor 1254	ND	0.025	ug/m3
Aroclor 1260	ND	0.025	ug/m3
Aroclor 1262	ND	0.025	ug/m3
Aroclor 1268	ND	0.025	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 10, 2011
Site Weather Conditions Sunny, 63 - 79°F, Predominate wind direction: WSW, Afternoon high wind 30 mph
General Site Notes 1) Elevated readings at WP-1 and WP-2 resulted from vehicle traffic on the site perimeter
NM = Not Measured road. Conditions were addressed with water. No 15 minute TWA was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	39	0.0
Minimum Instantaneous	8	0.0
Maximum Instantaneous	57	0.0
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	41	0.3
Minimum Instantaneous	11	0.0
Maximum Instantaneous	197	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	58	0.2
Minimum Instantaneous	10	0.0
Maximum Instantaneous	103	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	30	0.3
Minimum Instantaneous	7	0.0
Maximum Instantaneous	32	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	26	0.0
Minimum Instantaneous	6	0.0
Maximum Instantaneous	36	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	28	0.2
Minimum Instantaneous	8	0.0
Maximum Instantaneous	41	0.3
AIR-1		
Maximum 15 Minute TWA	39	NM
Minimum Instantaneous	8	NM
Maximum Instantaneous	88	NM
AIR-2		
Maximum 15 Minute TWA	39	NM
Minimum Instantaneous	12	NM
Maximum Instantaneous	82	NM
AIR-3		
Maximum 15 Minute TWA	33	NM
Minimum Instantaneous	8	NM
Maximum Instantaneous	35	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatic
Contractor suspends work, identifies source and addresses issue.

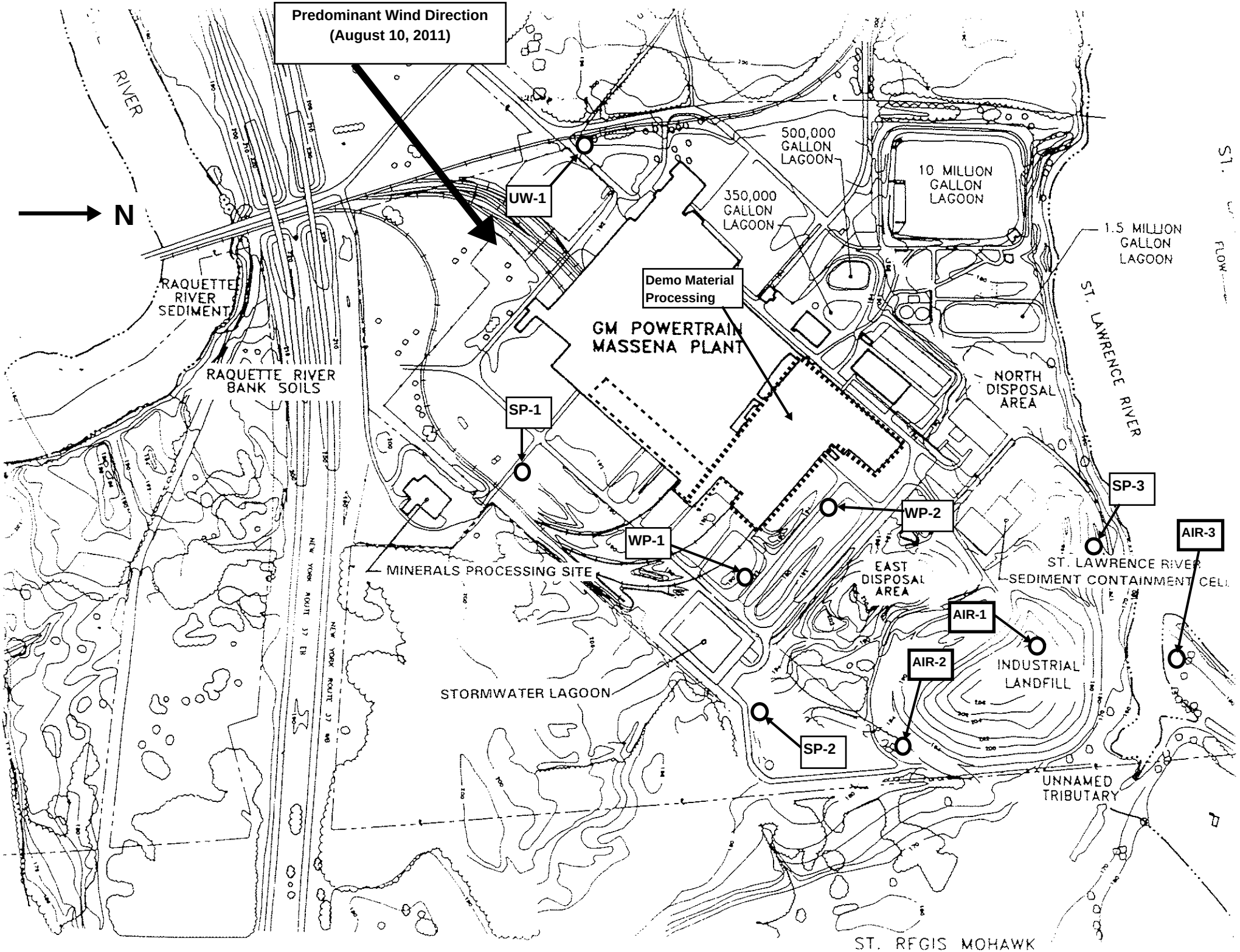
150 µg/m^3 Above background concentrations observed at upwind locatic
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatic
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatic
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
(August 10, 2011)
N
UW-1
500,000
GALLON
LAGOON
10 MILLION
GALLON
LAGOON
350,000
GALLON
LAGOON
1.5 MILLION
GALLON
LAGOON
Demo Material
Processing
GM POWERTRAIN
MASSENA PLANT
RAQUETTE
RIVER
SEDIMENT
RAQUETTE RIVER
BANK SOILS
NORTH
DISPOSAL
AREA
ST. LAWRENCE RIVER
SP-1
SP-3
WP-2
WP-1
AIR-3
MINERALS PROCESSING SITE
EAST
DISPOSAL
AREA
ST. LAWRENCE RIVER
SEDIMENT CONTAINMENT CELL
AIR-1
AIR-2
INDUSTRIAL
LANDFILL
STORMWATER LAGOON
SP-2
UNNAMED
TRIBUTARY
ST. REGIS MOHAWK

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Imagine the result

Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08102011-00105 **Date:** August 10, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (37)
Subcontractors: Heritage (2)
Perras (2)

Weather/Wind Partly Sunny 63 to 79 degrees F. with wind out of the SW at 3 to 14 mph, gusting to 30 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Due to rain yesterday much of the demolition floor is covered with standing rain water. The puddles cover tripping hazards. Workers should use caution when walking through standing water.
- Lunch is being provided to Brandenburg employees to mark the month of July going by without any lost time accidents.
- As part of the Hazardous Communication Program, MSDS sheets are available for all material brought on the job.
- John Williams presented a formal weekly safety meeting on Fall Protection

Work Activities Summary:

Brandenburg

- Limited wire stripping in TSCA exclusion zone.
- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with hydraulic shear.
- Shearing P&S and #1 iron in lay down area.
- Wrecking on high bay area at column line K/J from 25 to 19.
- Wrecking low bay 9/11 from F to J with 954 excavator.
- Two shears prepping P&S and #1 iron in lay down area.
- Loaded soil into 17 intermodal containers at Cell #3
- Loaded 17 intermodal containers with TSCA steel / debris at column M load out area.
- Sorting metals from C&D piles and separating stainless steel material with grapple and magnet.
- Installed new plug into manhole that runs to the oily waste collection system.
- Repaired roof drain over decon area inside door #42.
- Loading railcars with clean scrap.
- Loaded two 100 cy trailers with C&D material.
- Moving electric motors that were tested clean from the TSCA area to Non TSCA area for shipment.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Transporting containers to column M for TSCA demolition debris. Each load is weighed to calculate soil and debris weights.

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• Loaded 2 rail cars with 14 intermodal containers. Manifested by Heritage and inspected by ARCADIS.
Waste Materials Removed: Four BISCO dump trailers loaded with bailing material shipped to Ben Weisman Scrap yard in Owego NY. Two 100 cy trailers of C&D material shipped to Ontario County Landfill. 5 Heritage rail cars of TSCA material shipped out to Heritage Landfill in Indian. Nine clean scrap rail cars with P&S was shipped. One trailer load of dirty electrical material was shipped to United Metals.
Samples Collected, Requested/Received Analytical Results: None
Issues and Concerns: None
Resolutions to Issues and Concerns: None
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Thursday, September 01, 2011 4:32 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino; Brendan Mullen; 'Craig Arquette'
Cc: Casey, Dan; Carrillo-Sheridan, Margaret; Kemp, Dan; David Grant
Subject: Exceedance Notification Documentation
Attachments: Exceedance-Notification 8-25-11.pdf

All,

Please see the attached notice of monitoring results from Air Station 1 located at the top of the ILF for August 25, 2011. This is an exceedance above the established action level of 0.11 ug/m^3. No other air monitoring locations identified an issue on either date. This sample was collected 1 day before we instituted new controls from the last near exceedances.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

ARCADIS of New York, Inc. | c/o RACER Trust - 56 Chevrolet Road, Route 37 | Massena, NY, 13662
T. 315.764.2299 | M. 315.447.3217 |
www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **8/31/2011**

I. Identification of : **X** ***Exceedance*** _____ ***Near Exceedance***

Environmental Monitoring Parameter:

_____ Particulate Dust **x** PCBs in Air _____ VOCs

Date of Exceedance/Near Exceedance : 8/25/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 6:54 am on 8/25/11 to 6:57 am on 8/26/11 from Air Station #1.

Analytical Result (or measurement): 0.1540 ug/m^3 ***Evaluation Action Level:*** .07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. Brandenburg was loading soil into intermodal containers at cell #3. A total 17 intermodal containers were loaded with PCB-containing soil from Cell #3 during the day. Air monitoring station #1 is approx. 400-feet away and downwind from where the loading occurred. Wind gusts were logged up to 19 mph during the sampling interval period.

Brandenburg Representative Notified: *Mike Massiello and John Williams*
Date: 8/31/2011 *Time:* 4:55 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 8/31/2011 *Time:* 4:35 PM

Immediate Action(s) Required: ***X*** *Yes* _____ *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedance or near exceedance:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).

New additional measures include:

9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received (attached).

These actions will be re-evaluated to see if they are effective in preventing exceedances or near exceedances.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 9/1/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)	Intermodal Containers Loaded	Date Results Received
16	AIR1-07152011	7/15/2011	268	1432	384,244.4	0.07	0.11	0.0090 AP	7	7/21/11
17	AIR2-07152011	7/15/2011	259	1428	369,643.5	0.07	0.11	0.0078 AP		
18	AIR3-07152011	7/15/2011	264	1435	378,258.4	0.07	0.11	0.0065 J,AP		
19	AIR1-07162011	7/16/2011	259	1913	495,147.6	0.07	0.11	0.0060 AP	31	7/22/11
20	AIR2-07162011	7/16/2011	257	1911	490,505.0	0.07	0.11	0.0043 J,AP		
21	AIR3-07162011	7/16/2011	261	1915	500,307.6	0.07	0.11	0.0041 J,AP		
22	AIR4-07162011	7/16/2011	N/A	N/A	405,641.8*	0.07	0.11	ND		
23	AIR1-07192011	7/19/2011	260	1449	377,311.6	0.07	0.11	0.0182 AP	8	7/25/11
24	AIR2-07192011	7/19/2011	253	1451	367,385.7	0.07	0.11	0.0113 AP		
25	AIR3-07192011	7/19/2011	266	1441	383,005.0	0.07	0.11	0.0066 J,AP		
26	AIR1-07202011	7/20/2011	253	1448	365,727.4	0.07	0.11	0.0117 AP	24	7/26/11
27	AIR2-07202011	7/20/2011	254	1450	367,817.3	0.07	0.11	0.0064 J,AP		
28	AIR3-07202011	7/20/2011	255	1434	365,451.3	0.07	0.11	0.0050 J,AP		
29	AIR1-07212011	7/21/2011	258	1420	365,798.5	0.07	0.11	0.0360 AP		7/27/11
30	AIR2-07212011	7/21/2011	251	1420	357,119.4	0.07	0.11	0.0045 J,AP		
31	AIR3-07212011	7/21/2011	248	1435	356,331.4	0.07	0.11	0.0207 AP		
32	AIR1-07222011	7/22/2011	256	1430	366,077.4	0.07	0.11	0.0350 AP	0	7/28/11
33	AIR2-07222011	7/22/2011	249	1434	357,074.8	0.07	0.11	0.0147 AP		
34	AIR3-07222011	7/22/2011	249	1436	357,457.2	0.07	0.11	0.0106 AP		
35	AIR4-07222011	7/22/2011	N/A	N/A	358,562.1	0.07	0.11	ND		
36	AIR1-07232011	7/23/2011	236	1963	462,732.0	0.07	0.11	0.0250 AP	0	7/29/11
37	AIR2-07232011	7/23/2011	239	1960	467,956.9	0.07	0.11	0.0111 AP		
38	AIR3-07232011	7/23/2011	239	1936	462,294.8	0.07	0.11	0.0092 AP		
39	AIR1-07262011	7/26/2011	263	1445	379,621.8	0.07	0.11	0.0422 AP	16	8/1/11
40	AIR2-07262011	7/26/2011	253	1439	364,634.1	0.07	0.11	0.0095 J,AP		
41	AIR3-07262011	7/26/2011	263	1439	378,607.4	0.07	0.11	0.0177 AP		
42	AIR1-07272011	7/27/2011	259	1437	371,580.1	0.07	0.11	0.1110 AP	5	8/2/11
43	AIR2-07272011	7/27/2011	253	1435	363,657.2	0.07	0.11	0.0246 AP		
44	AIR3-07272011	7/27/2011	261	1428	372,563.7	0.07	0.11	0.0239 AP		
45	AIR1-07282011	7/28/2011	242	2021	488,395.3	0.07	0.11	0.0273 AP	24	8/3/11
46	AIR2-07282011	7/28/2011	235	2016	473,894.2	0.07	0.11	0.0056 AP		
47	AIR3-07282011	7/28/2011	228	2024	460,525.6	0.07	0.11	0.0115 AP		
48	AIR1-08022011	8/2/2011	243	1372	334,041.2	0.07	0.11	0.0215 AP	0	8/8/11
49	AIR2-08022011	8/2/2011	237	1420	336,330.7	0.07	0.11	0.0370 AP		
50	AIR3-08022011	8/2/2011	256	1379	353,209.5	0.07	0.11	0.0158 AP		
51	AIR1-08032011	8/3/2011	260	1413	367,387.1	0.07	0.11	0.0074 J,AP	16	8/9/11
52	AIR2-08032011	8/3/2011	256	1439	368,051.9	0.07	0.11	0.0089 AP		
53	AIR3-08032011	8/3/2011	257	1420	365,107.7	0.07	0.11	0.0058 J,AP		
54	AIR1-08042011	8/4/2011	262	1436	376,007.2	0.07	0.11	0.0016 J,AP	12	8/10/11
55	AIR2-08042011	8/4/2011	252	1434	360,782.0	0.07	0.11	0.0029 J,AP		
56	AIR3-08042011	8/4/2011	265	1435	380,679.0	0.07	0.11	0.0016 J,AP		
57	AIR1-08052011	8/5/2011	266	1432	381,083.0	0.07	0.11	0.0028 J,AP	16	8/11/11
58	AIR2-08052011	8/5/2011	251	1428	358,005.0	0.07	0.11	0.0034 J,AP		
59	AIR3-08052011	8/5/2011	260	1189	309,446.4	0.07	0.11	0.0057 J,AP		
60	AIR4-08052011	8/5/2011	N/A	N/A	354,853.1	0.07	0.11	ND		
61	AIR1-08062011	8/6/2011	243	2037	495,148.7	0.07	0.11	0.0187 AP	31	8/12/11
62	AIR2-08062011	8/6/2011	236	2037	481,660.6	0.07	0.11	0.0064 AP		
63	AIR3-08062011	8/6/2011	236	1996	471,534.8	0.07	0.11	0.0067 AP		
64	AIR1-08092011	8/9/2011	278	1453	403,265.5	0.07	0.11	0.0069 AP	19	8/16/11
65	AIR2-08092011	8/9/2011	282	1453	409,820.8	0.07	0.11	0.0052 J,AP		
66	AIR3-08092011	8/9/2011	262	1440	377,097.8	0.07	0.11	0.0027 J,AP		
67	AIR1-08102011	8/10/2011	267	1432	381,739.0	0.07	0.11	0.0135 AP	16	8/16/11
68	AIR2-08102011	8/10/2011	283	1433	405,673.2	0.07	0.11	0.0070 AP		
69	AIR3-08102011	8/10/2011	270	1425	384,611.1	0.07	0.11	0.0062 J,AP		
70	AIR1-08112011	8/11/2011	279	1428	398,989.8	0.07	0.11	0.134 AP	17	8/17/11
71	AIR2-08112011	8/11/2011	286	1420	406,765.8	0.07	0.11	0.0117 AP		
72	AIR3-08112011	8/11/2011	269	1432	385,317.3	0.07	0.11	0.0304 AP		

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)	Intermodal Containers Loaded	Date Results Received
73	AIR1-08122011	8/12/2011	274	1432	392,710.8	0.07	0.11	0.0940 J,AP	11	8/18/11
74	AIR2-08122011	8/12/2011	291	184	53,561.0	0.07	0.11	0.0357 J,AP		
75	AIR3-08122011	8/12/2011	262	1413	369,572.4	0.07	0.11	0.0139 AP		
76	AIR4-08122011	8/12/2011	N/A	N/A	371,111.5	0.07	0.11	ND		
77	AIR1-08132011	8/13/2011	260	1908	496,228.8	0.07	0.11	0.0310 AP	11	8/19/11
78	AIR2-08132011	8/13/2011	279	1872	522,453.5	0.07	0.11	0.0104 AP		
79	AIR3-08132011	8/13/2011	265	1900	504,364.2	0.07	0.11	0.0215 AP		
80	AIR1-08162011	8/16/2011	255	1450	369,975.7	0.07	0.11	ND	0	8/22/11
81	AIR2-08162011	8/16/2011	281	1438	404,567.7	0.07	0.11	0.0021 J,AP		
82	AIR3-08162011	8/16/2011	275	1406	386,634.6	0.07	0.11	0.0016 J,AP		
83	AIR1-08172011	8/17/2011	265	1432	378,975.7	0.07	0.11	0.0156 AP	0	8/23/11
84	AIR2-08172011	8/17/2011	273	1414	386,126.5	0.07	0.11	0.0088 AP		
85	AIR3-08172011	8/17/2011	263	1428	375,080.6	0.07	0.11	0.0042 J,AP		
86	AIR1-08182011	8/18/2011	246	1414	348,072.8	0.07	0.11	0.0116 AP	0	8/24/11
87	AIR2-08182011	8/18/2011	244	1424	347,584.3	0.07	0.11	0.0067 J,AP		
88	AIR3-08182011	8/18/2011	269	1428	384,064.2	0.07	0.11	0.0063 J,AP		
89	AIR1-08192011	8/19/2011	242	1425	344,182.6	0.07	0.11	0.0780 AP	14	8/25/11
90	AIR2-08192011	8/19/2011	242	1425	345,150.2	0.07	0.11	0.0340 J,AP		
91	AIR3-08192011	8/19/2011	264	1427	377,227.5	0.07	0.11	0.0099 AP		
92	AIR1-08202011	8/20/2011	240	1919	460,849.1	0.07	0.11	0.0460 AP	0	8/26/11
93	AIR2-08202011	8/20/2011	242	1936	468,688.1	0.07	0.11	0.0077 AP		
94	AIR3-08202011	8/20/2011	262	1942	508,392.7	0.07	0.11	0.0177 AP		
95	AIR1-08232011	8/23/2011	251	1432	359,616.3	0.07	0.11	0.0156 AP	0	8/29/11
96	AIR2-08232011	8/23/2011	244	1429	348,792.8	0.07	0.11	0.0087 AP		
97	AIR3-08232011	8/23/2011	279	1434	399,473.0	0.07	0.11	0.0085 J,AP		
98	AIR1-08242011	8/24/2011	247	1431	353,818.3	0.07	0.11	0.0580 AP	21	8/30/11
99	AIR2-08242011	8/24/2011	247	1428	353,048.9	0.07	0.11	0.0065 J,AP		
100	AIR3-08242011	8/24/2011	269	1424	382,915.9	0.07	0.11	0.0183 AP		
101	AIR1-08252011	8/25/2011	242	1438	347,935.5	0.07	0.11	0.0135 AP	18	8/31/11
102	AIR2-08252011	8/25/2011	243	1440	349,307.5	0.07	0.11	0.0027 J,AP		
103	AIR3-08252011	8/25/2011	260	1439	373,983.0	0.07	0.11	0.0089 AP		
104	AIR1-08262011	8/26/2011	245	1443	353,512.9	0.07	0.11	0.1540 AP	18	9/1/11
105	AIR2-08262011	8/26/2011	244	1449	353,771.3	0.07	0.11	0.0103 AP		
106	AIR3-08262011	8/26/2011	260	1439	374,820.3	0.07	0.11	0.0290 AP		
107	AIR4-08262011	8/26/2011	N/A	N/A	361,444.1	0.07	0.11	ND		
108	AIR1-08272011	8/27/2011	227	1921	435,711.2	0.07	0.11		34	9/2/11
109	AIR2-08272011	8/27/2011	231	1941	447,624.4	0.07	0.11			
110	AIR3-08272011	8/27/2011	245	1912	468,335.9	0.07	0.11			
111	AIR1-08302011	8/30/2011	251	1421	356,160.9	0.07	0.11		0	9/6/11
112	AIR2-08302011	8/30/2011	246	1418	348,577.6	0.07	0.11			
113	AIR3-08302011	8/30/2011	273	1417	387,409.7	0.07	0.11			
114	AIR1-08312011	8/31/2011	249	1436	357,028.1	0.07	0.11		0	9/7/11
115	AIR2-08312011	8/31/2011	247	1439	355,917.8	0.07	0.11			
116	AIR3-08312011	8/31/2011	276	1444	398,963.7	0.07	0.11			

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

ND = Not Detected above laboratory reporting limit

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-08262011

GC Semivolatiles

Lot-Sample #...: H1H270402-001 **Work Order #...:** ML3VX1AA **Matrix.....:** AA
Date Sampled...: 08/26/11 **Date Received..:** 08/27/11
Prep Date.....: 08/27/11 **Analysis Date..:** 08/31/11
Prep Batch #...: 1239015
Dilution Factor: 14.14 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.088	ug/m3
Aroclor 1221	ND	0.028	ug/m3
Aroclor 1232	ND G	0.16	ug/m3
Aroclor 1242	**0.11 AP**	**0.028**	**ug/m3**
Aroclor 1248	**0.044 AP**	**0.028**	**ug/m3**
Aroclor 1254	ND	0.028	ug/m3
Aroclor 1260	ND	0.028	ug/m3
Aroclor 1262	ND	0.028	ug/m3
Aroclor 1268	ND	0.028	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 25, 2011
Site Weather Conditions Broken Cloud/Rain, 66 - 77°F, Predominate wind direction: SSE, Morning high wind 22 mph
General Site Notes
1) Elevated readings at WP-1 resulted from dry demo pad and increased equipment activity.
NM = Not Measured
2) Contractor was notified and the conditions were addressed with water.
3) 15 minute TWA was not exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	30	0.1
Minimum Instantaneous	10	0.0
Maximum Instantaneous	61	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	50	0.3
Minimum Instantaneous	13	0.0
Maximum Instantaneous	146	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	22	0.2
Minimum Instantaneous	11	0.0
Maximum Instantaneous	47	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	28	0.5
Minimum Instantaneous	11	0.0
Maximum Instantaneous	31	0.5
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	21	0.1
Minimum Instantaneous	7	0.0
Maximum Instantaneous	25	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	25	0.3
Minimum Instantaneous	8	0.0
Maximum Instantaneous	33	0.3
AIR-1		
Maximum 15 Minute TWA	38	NM
Minimum Instantaneous	11	NM
Maximum Instantaneous	70	NM
AIR-2		
Maximum 15 Minute TWA	27	NM
Minimum Instantaneous	12	NM
Maximum Instantaneous	30	NM
AIR-3		
Maximum 15 Minute TWA	37	NM
Minimum Instantaneous	10	NM
Maximum Instantaneous	56	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.

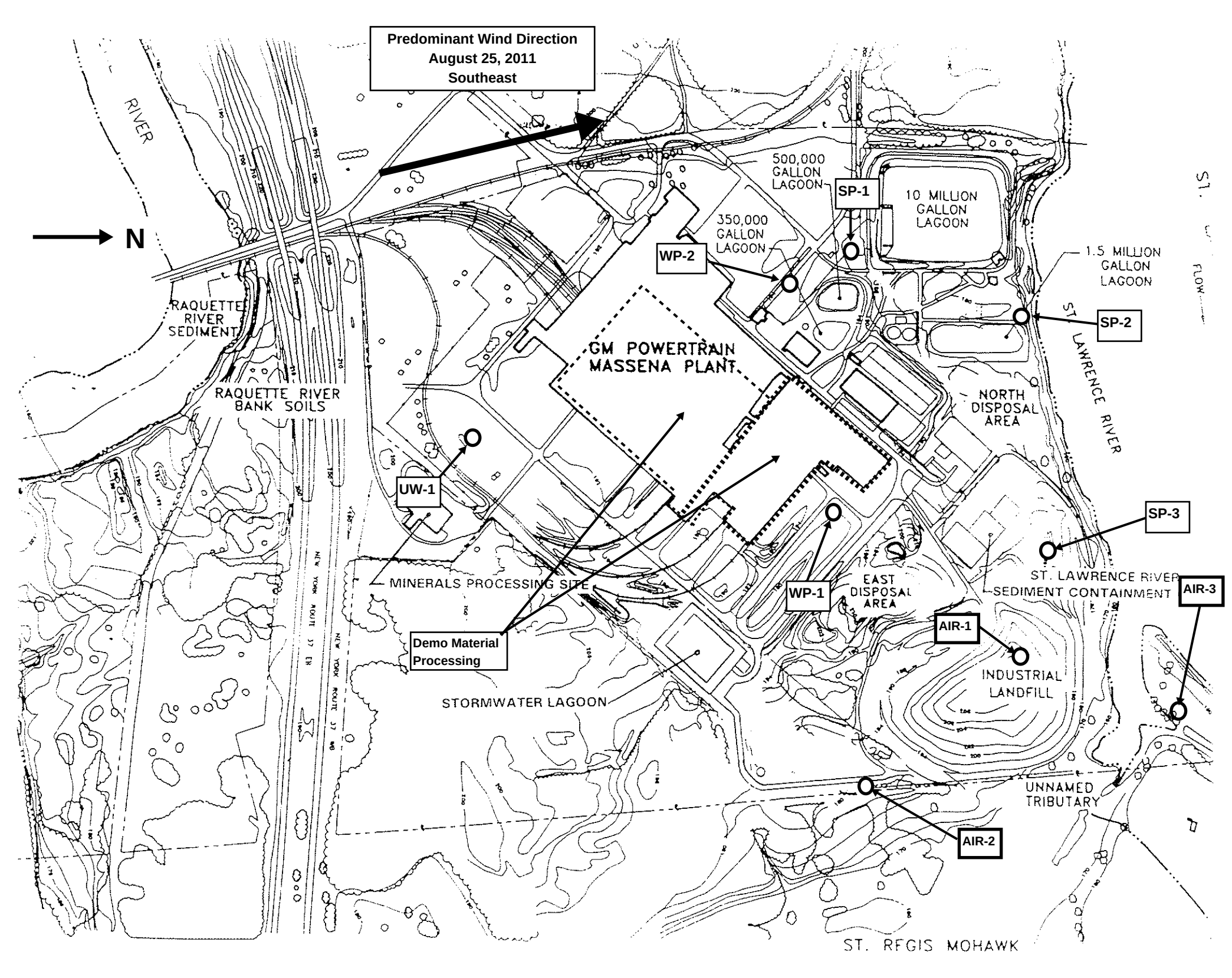
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
August 25, 2011
Southeast
N
RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
500,000 GALLON LAGOON
SP-1
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
WP-2
1.5 MILLION GALLON LAGOON
SP-2
ST. LAWRENCE RIVER
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
UW-1
SP-3
MINERALS PROCESSING SITE
WP-1
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08252011-00118 **Date:** August 25, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (34)
Subcontractors: Op Tech (1)
Perras (2)
Heritage (2)

Weather/Wind: Rain on and off, 66 to 77 degrees F with wind out of the SE at 5 to 10 mph with gusts up to 22 mph. .17" of precipitation

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- The PPE for the TSCA exclusion zone includes Tyvek suits. Everyone must wear the suits including all equipment operators.
- In the TSCA exclusion zone our work included the removal of Non TSCA steel from the exclusion zone. All equipment operators and supervision must be aware of how each bay should be segregated. Anyone with questions should notify their supervisor so that everyone is on the same page.
- During times when the rain stops all operators and supervisors should notify the water truck driver of areas that need dust control measures.
- Formal Weekly Tool Box talk for the crew – subject Fire Protection and Classification of Fires and extinguishers.

Work Activities Summary:

Brandenburg

- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with one hydraulic shear.
- Wrecking low bays in TSCA exclusion zone at column line J/K from 9 to 3 and column line L/K from 7 to 9.
- Removing brick and block from exterior of administration building. On site trucking of this hard fill material to the pile in the lay down area.
- Torch cutting in designated burn field on the east side of the building footprint in AM.
- Cleaned out the western crusher pit of remaining scrap in PM.
- Shearing #1 iron in lay down area with one shear.
- Disassembly of 984 excavator.
- One shear prepping #1 iron in lay down area.
- One shear prepping material generated from the demolition activity at chiller building and cooling tower.
- Sorting metals from C&D piles and separating stainless steel material with grapple.
- Wire stripping activity back up and running.
- Loaded seventeen loads of TSCA soil at cell#3
- Loaded sixteen loads of TSCA debris in reduction zone at column line #29.
- Loaded one railcars with clean bailing material.

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- Shearing and torch cutting water tower to regain access to west road.

Op Tech
- Overseeing asbestos roofing material removal as part of demolition activity.
- Cleaning up and inspecting asbestos exclusion zone.

Heritage
- Rotating intermodal containers to the cell #3 loading area and to column #29 TSCA debris load out area at column #29.
- Obtaining weights for soil and debris that is loaded into intermodal containers.
- Loaded three rail cars with twenty one intermodal containers.
- Manifesting and inspecting loads.

Waste Materials Removed:
Shipped one railcar with clean sheet metal to Camden Metals in Philly. Shipped one trailer load of misc electric and conduit to United Metals. Shipped three Heritage rail cars out with 21 intermodal containers to Heritage Landfill in Indiana.

Samples Collected, Requested/Received Analytical Results:
None

Issues and Concerns:
None

Resolutions to Issues and Concerns:
None

Potential Delays:
None determined at this time.

Supplemental Information:
- See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Wednesday, September 14, 2011 2:25 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino
Cc: Brendan Mullen; 'Craig Arquette'; Casey, Dan; Carrillo-Sheridan, Margaret; Kemp, Dan; David Grant
Subject: Exceedance Notification Documentation
Attachments: Exceedance-Notification 8-30-11.pdf

All,

Please see the attached notice of monitoring results from Air Station 1 located at the top of the ILF for August 30, 2011. This is an exceedance above the established action level of 0.11 ug/m^3. This exceedances occurred the day before we instituted short term actions to previous exceedances on August 25. No other air monitoring locations identified an issue on this date.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

ARCADIS of New York, Inc. | c/o RACER Trust - 56 Chevrolet Road, Route 37 | Massena, NY, 13662
T. 315.764.2299 | M. 315.447.3217 |
www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **9/13/2011**

I. Identification of : **X** ***Exceedance*** _____ ***Near Exceedance***

Environmental Monitoring Parameter:

_____ Particulate Dust **x** PCBs in Air _____ VOCs

Date of Exceedance/Near Exceedance : 8/30/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:03 am on 8/30/11 to 6:59 am on 8/31/11 from Air Station #1.

Analytical Result (or measurement): 0.155 ug/m^3 ***Evaluation Action Level:*** .11 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers work activities from Brandenburg for 1 day (8/30/11) and the evening of of 8/30/11. Brandenburg loaded PCB-containing soil into 17 intermodal containers on 8/30/11. Air monitoring station #1 is approximately 280-feet away and downwind from where the loading occurred. Wind gusts were logged up to 17 mph during the sampling interval period.

Brandenburg Representative Notified: *Mike Massiello*
Date: 9/8/2011 *Time:* 4:12 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 9/8/2011 *Time:* 3:32 PM

Immediate Action(s) Required: _____ *Yes* _____ *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedance or near exceedance:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these short term actions were implemented the day after receiving this exceedance. USEPA and ARCADIS will monitor the PCB high volume air analytical results for the next following 5 days and assess at that time whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 9/13/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)	Intermodal Containers Loaded	Date Results Received	Predominate Wind Direction
16	AIR1-07152011	7/15/2011	268	1432	384,244.4	0.07	0.11	0.0090 AP	7	7/21/11	NNW
17	AIR2-07152011	7/15/2011	259	1428	369,643.5	0.07	0.11	0.0078 AP			
18	AIR3-07152011	7/15/2011	264	1435	378,258.4	0.07	0.11	0.0065 J,AP			
19	AIR1-07162011	7/16/2011	259	1913	495,147.6	0.07	0.11	0.0060 AP	31	7/22/11	WSW & NNW
20	AIR2-07162011	7/16/2011	257	1911	490,505.0	0.07	0.11	0.0043 J,AP			
21	AIR3-07162011	7/16/2011	261	1915	500,307.6	0.07	0.11	0.0041 J,AP			
22	AIR4-07162011	7/16/2011	N/A	N/A	405,641.8*	0.07	0.11	ND			
23	AIR1-07192011	7/19/2011	260	1449	377,311.6	0.07	0.11	0.0182 AP	8	7/25/11	WSW & NNW
24	AIR2-07192011	7/19/2011	253	1451	367,385.7	0.07	0.11	0.0113 AP			
25	AIR3-07192011	7/19/2011	266	1441	383,005.0	0.07	0.11	0.0066 J,AP			
26	AIR1-07202011	7/20/2011	253	1448	365,727.4	0.07	0.11	0.0117 AP	24	7/26/11	SW
27	AIR2-07202011	7/20/2011	254	1450	367,817.3	0.07	0.11	0.0064 J,AP			
28	AIR3-07202011	7/20/2011	255	1434	365,451.3	0.07	0.11	0.0050 J,AP			
29	AIR1-07212011	7/21/2011	258	1420	365,798.5	0.07	0.11	0.0360 AP	0	7/27/11	SW
30	AIR2-07212011	7/21/2011	251	1420	357,119.4	0.07	0.11	0.0045 J,AP			
31	AIR3-07212011	7/21/2011	248	1435	356,331.4	0.07	0.11	0.0207 AP			
32	AIR1-07222011	7/22/2011	256	1430	366,077.4	0.07	0.11	0.0350 AP	0	7/28/11	SSW
33	AIR2-07222011	7/22/2011	249	1434	357,074.8	0.07	0.11	0.0147 AP			
34	AIR3-07222011	7/22/2011	249	1436	357,457.2	0.07	0.11	0.0106 AP			
35	AIR4-07222011	7/22/2011	N/A	N/A	358,562.1	0.07	0.11	ND			
36	AIR1-07232011	7/23/2011	236	1963	462,732.0	0.07	0.11	0.0250 AP	0	7/29/11	SSW & S
37	AIR2-07232011	7/23/2011	239	1960	467,956.9	0.07	0.11	0.0111 AP			
38	AIR3-07232011	7/23/2011	239	1936	462,294.8	0.07	0.11	0.0092 AP			
39	AIR1-07262011	7/26/2011	263	1445	379,621.8	0.07	0.11	0.0422 AP	16	8/1/11	SSE
40	AIR2-07262011	7/26/2011	253	1439	364,634.1	0.07	0.11	0.0095 J,AP			
41	AIR3-07262011	7/26/2011	263	1439	378,607.4	0.07	0.11	0.0177 AP			
42	AIR1-07272011	7/27/2011	259	1437	371,580.1	0.07	0.11	0.1110 AP	5	8/2/11	S
43	AIR2-07272011	7/27/2011	253	1435	363,657.2	0.07	0.11	0.0246 AP			
44	AIR3-07272011	7/27/2011	261	1428	372,563.7	0.07	0.11	0.0239 AP			
45	AIR1-07282011	7/28/2011	242	2021	488,395.3	0.07	0.11	0.0273 AP	24	8/3/11	W & SW
46	AIR2-07282011	7/28/2011	235	2016	473,894.2	0.07	0.11	0.0056 AP			
47	AIR3-07282011	7/28/2011	228	2024	460,525.6	0.07	0.11	0.0115 AP			
48	AIR1-08022011	8/2/2011	243	1372	334,041.2	0.07	0.11	0.0215 AP	0	8/8/11	W
49	AIR2-08022011	8/2/2011	237	1420	336,330.7	0.07	0.11	0.0370 AP			
50	AIR3-08022011	8/2/2011	256	1379	353,209.5	0.07	0.11	0.0158 AP			
51	AIR1-08032011	8/3/2011	260	1413	367,387.1	0.07	0.11	0.0074 J,AP	16	8/9/11	NNW
52	AIR2-08032011	8/3/2011	256	1439	368,051.9	0.07	0.11	0.0089 AP			
53	AIR3-08032011	8/3/2011	257	1420	365,107.7	0.07	0.11	0.0058 J,AP			
54	AIR1-08042011	8/4/2011	262	1436	376,007.2	0.07	0.11	0.0016 J,AP	12	8/10/11	NE & SSE
55	AIR2-08042011	8/4/2011	252	1434	360,782.0	0.07	0.11	0.0029 J,AP			
56	AIR3-08042011	8/4/2011	265	1435	380,679.0	0.07	0.11	0.0016 J,AP			
57	AIR1-08052011	8/5/2011	266	1432	381,083.0	0.07	0.11	0.0028 J,AP	16	8/11/11	NNE
58	AIR2-08052011	8/5/2011	251	1428	358,005.0	0.07	0.11	0.0034 J,AP			
59	AIR3-08052011	8/5/2011	260	1189	309,446.4	0.07	0.11	0.0057 J,AP			
60	AIR4-08052011	8/5/2011	N/A	N/A	354,853.1	0.07	0.11	ND			
61	AIR1-08062011	8/6/2011	243	2037	495,148.7	0.07	0.11	0.0187 AP	31	8/12/11	NNE & WSW
62	AIR2-08062011	8/6/2011	236	2037	481,660.6	0.07	0.11	0.0064 AP			
63	AIR3-08062011	8/6/2011	236	1996	471,534.8	0.07	0.11	0.0067 AP			
64	AIR1-08092011	8/9/2011	278	1453	403,265.5	0.07	0.11	0.0069 AP	19	8/16/11	N
65	AIR2-08092011	8/9/2011	282	1453	409,820.8	0.07	0.11	0.0052 J,AP			
66	AIR3-08092011	8/9/2011	262	1440	377,097.8	0.07	0.11	0.0027 J,AP			
67	AIR1-08102011	8/10/2011	267	1432	381,739.0	0.07	0.11	0.0135 AP	16	8/16/11	S& NNE
68	AIR2-08102011	8/10/2011	283	1433	405,673.2	0.07	0.11	0.0070 AP			
69	AIR3-08102011	8/10/2011	270	1425	384,611.1	0.07	0.11	0.0062 J,AP			
70	AIR1-08112011	8/11/2011	279	1428	398,989.8	0.07	0.11	0.134 AP	17	8/17/11	WSW
71	AIR2-08112011	8/11/2011	286	1420	406,765.8	0.07	0.11	0.0117 AP			
72	AIR3-08112011	8/11/2011	269	1432	385,317.3	0.07	0.11	0.0304 AP			

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)	Intermodal Containers Loaded	Date Results Received	Predominate Wind Direction
73	AIR1-08122011	8/12/2011	274	1432	392,710.8	0.07	0.11	0.0940 J,AP	11	8/18/11	WSW
74	AIR2-08122011	8/12/2011	291	184	53,561.0	0.07	0.11	0.0357 J,AP			
75	AIR3-08122011	8/12/2011	262	1413	369,572.4	0.07	0.11	0.0139 AP			
76	AIR4-08122011	8/12/2011	N/A	N/A	371,111.5	0.07	0.11	ND			
77	AIR1-08132011	8/13/2011	260	1908	496,228.8	0.07	0.11	0.0310 AP	11	8/19/11	W & SW
78	AIR2-08132011	8/13/2011	279	1872	522,453.5	0.07	0.11	0.0104 AP			
79	AIR3-08132011	8/13/2011	265	1900	504,364.2	0.07	0.11	0.0215 AP			
80	AIR1-08162011	8/16/2011	255	1450	369,975.7	0.07	0.11	ND	0	8/22/11	NNE
81	AIR2-08162011	8/16/2011	281	1438	404,567.7	0.07	0.11	0.0021 J,AP			
82	AIR3-08162011	8/16/2011	275	1406	386,634.6	0.07	0.11	0.0016 J,AP			
83	AIR1-08172011	8/17/2011	265	1432	378,975.7	0.07	0.11	0.0156 AP	0	8/23/11	NE & WNW
84	AIR2-08172011	8/17/2011	273	1414	386,126.5	0.07	0.11	0.0088 AP			
85	AIR3-08172011	8/17/2011	263	1428	375,080.6	0.07	0.11	0.0042 J,AP			
86	AIR1-08182011	8/18/2011	246	1414	348,072.8	0.07	0.11	0.0116 AP	0	8/24/11	W
87	AIR2-08182011	8/18/2011	244	1424	347,584.3	0.07	0.11	0.0067 J,AP			
88	AIR3-08182011	8/18/2011	269	1428	384,064.2	0.07	0.11	0.0063 J,AP			
89	AIR1-08192011	8/19/2011	242	1425	344,182.6	0.07	0.11	0.0780 AP	14	8/25/11	SSE
90	AIR2-08192011	8/19/2011	242	1425	345,150.2	0.07	0.11	0.0340 J,AP			
91	AIR3-08192011	8/19/2011	264	1427	377,227.5	0.07	0.11	0.0099 AP			
92	AIR1-08202011	8/20/2011	240	1919	460,849.1	0.07	0.11	0.0460 AP	0	8/26/11	SE & SSE
93	AIR2-08202011	8/20/2011	242	1936	468,688.1	0.07	0.11	0.0077 AP			
94	AIR3-08202011	8/20/2011	262	1942	508,392.7	0.07	0.11	0.0177 AP			
95	AIR1-08232011	8/23/2011	251	1432	359,616.3	0.07	0.11	0.0156 AP	0	8/29/11	S
96	AIR2-08232011	8/23/2011	244	1429	348,792.8	0.07	0.11	0.0087 AP			
97	AIR3-08232011	8/23/2011	279	1434	399,473.0	0.07	0.11	0.0085 J,AP			
98	AIR1-08242011	8/24/2011	247	1431	353,818.3	0.07	0.11	0.0580 AP	21	8/30/11	SSE
99	AIR2-08242011	8/24/2011	247	1428	353,048.9	0.07	0.11	0.0065 J,AP			
100	AIR3-08242011	8/24/2011	269	1424	382,915.9	0.07	0.11	0.0183 AP			
101	AIR1-08252011	8/25/2011	242	1438	347,935.5	0.07	0.11	0.0135 AP	18	8/31/11	SE
102	AIR2-08252011	8/25/2011	243	1440	349,307.5	0.07	0.11	0.0027 J,AP			
103	AIR3-08252011	8/25/2011	260	1439	373,983.0	0.07	0.11	0.0089 AP			
104	AIR1-08262011	8/26/2011	245	1443	353,512.9	0.07	0.11	0.1540 AP	18	9/1/11	SSE
105	AIR2-08262011	8/26/2011	244	1449	353,771.3	0.07	0.11	0.0103 AP			
106	AIR3-08262011	8/26/2011	260	1439	374,820.3	0.07	0.11	0.0290 AP			
107	AIR4-08262011	8/26/2011	N/A	N/A	361,444.1	0.07	0.11	ND			
108	AIR1-08272011	8/27/2011	227	1921	435,711.2	0.07	0.11	0.0760 AP	34	9/2/11	WSW & SE
109	AIR2-08272011	8/27/2011	231	1941	447,624.4	0.07	0.11	0.0085 AP			
110	AIR3-08272011	8/27/2011	245	1912	468,335.9	0.07	0.11	0.0121 AP			
111	AIR1-08302011	8/30/2011	251	1421	356,160.9	0.07	0.11	0.0460 AP	0	9/6/11	SE
112	AIR2-08302011	8/30/2011	246	1418	348,577.6	0.07	0.11	0.0133 AP			
113	AIR3-08302011	8/30/2011	273	1417	387,409.7	0.07	0.11	0.0092 AP			
114	AIR1-08312011	8/31/2011	249	1436	357,028.1	0.07	0.11	0.1550 AP	17	9/7/11	SW
115	AIR2-08312011	8/31/2011	247	1439	355,917.8	0.07	0.11	0.0187 AP			
116	AIR3-08312011	8/31/2011	276	1444	398,963.7	0.07	0.11	0.0205 AP			
117	AIR1-09012011	9/1/2011	249	1442	358,757.7	0.07	0.11	0.0032 J,AP	0	9/9/11	NE
118	AIR2-09012011	9/1/2011	250	1442	360,018.3	0.07	0.11	0.0026 J,AP			
119	AIR3-09012011	9/1/2011	272	1424	386,809.6	0.07	0.11	0.0019 J,AP			
120	AIR1-09012011B	9/1/2011	245	628	154,118.1	0.07	0.11	ND	17	9/9/11	ENE
121	AIR2-09012011B	9/1/2011	245	606	148,180.2	0.07	0.11	ND			
122	AIR3-09012011B	9/1/2011	255	602	153,223.0	0.07	0.11	ND			
123	AIR1-09022011	9/2/2011	242	1282	309,818.9	0.07	0.11	0.0268 AP	0	9/12/11	SE
124	AIR2-09022011	9/2/2011	242	1300	315,044.9	0.07	0.11	0.0110 AP			
125	AIR3-09022011	9/2/2011	260	1295	336,216.4	0.07	0.11	0.0105 AP			
126	AIR4-09022011	9/2/2011	N/A	N/A	333,295.1	0.07	0.11	ND			

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-08312011

GC Semivolatiles

Lot-Sample #...: H1I010405-001 **Work Order #...:** ML6031AA **Matrix.....:** AA
Date Sampled...: 08/31/11 **Date Received..:** 09/01/11
Prep Date.....: 09/02/11 **Analysis Date..:** 09/06/11
Prep Batch #...: 1245015
Dilution Factor: 14 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.086	ug/m3
Aroclor 1221	ND	0.028	ug/m3
Aroclor 1232	ND G	0.13	ug/m3
Aroclor 1242	**0.11 AP**	**0.028**	**ug/m3**
Aroclor 1248	**0.045 AP**	**0.028**	**ug/m3**
Aroclor 1254	ND	0.028	ug/m3
Aroclor 1260	ND	0.028	ug/m3
Aroclor 1262	ND	0.028	ug/m3
Aroclor 1268	ND	0.028	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 30, 2011
Site Weather Conditions Sunny, 57 - 76°F, Predominate wind direction: SW, Afternoon high wind 17 mph
General Site Notes 1) Elevated readings at WP-1 resulted from equipment activity on the demolition pad.
NM = Not Measured 2) Elevated readings at WP-2 resulted from administration building demolition activities.
3) In all cases, conditions were addressed with water. No 15 minute TWA was exceeded.

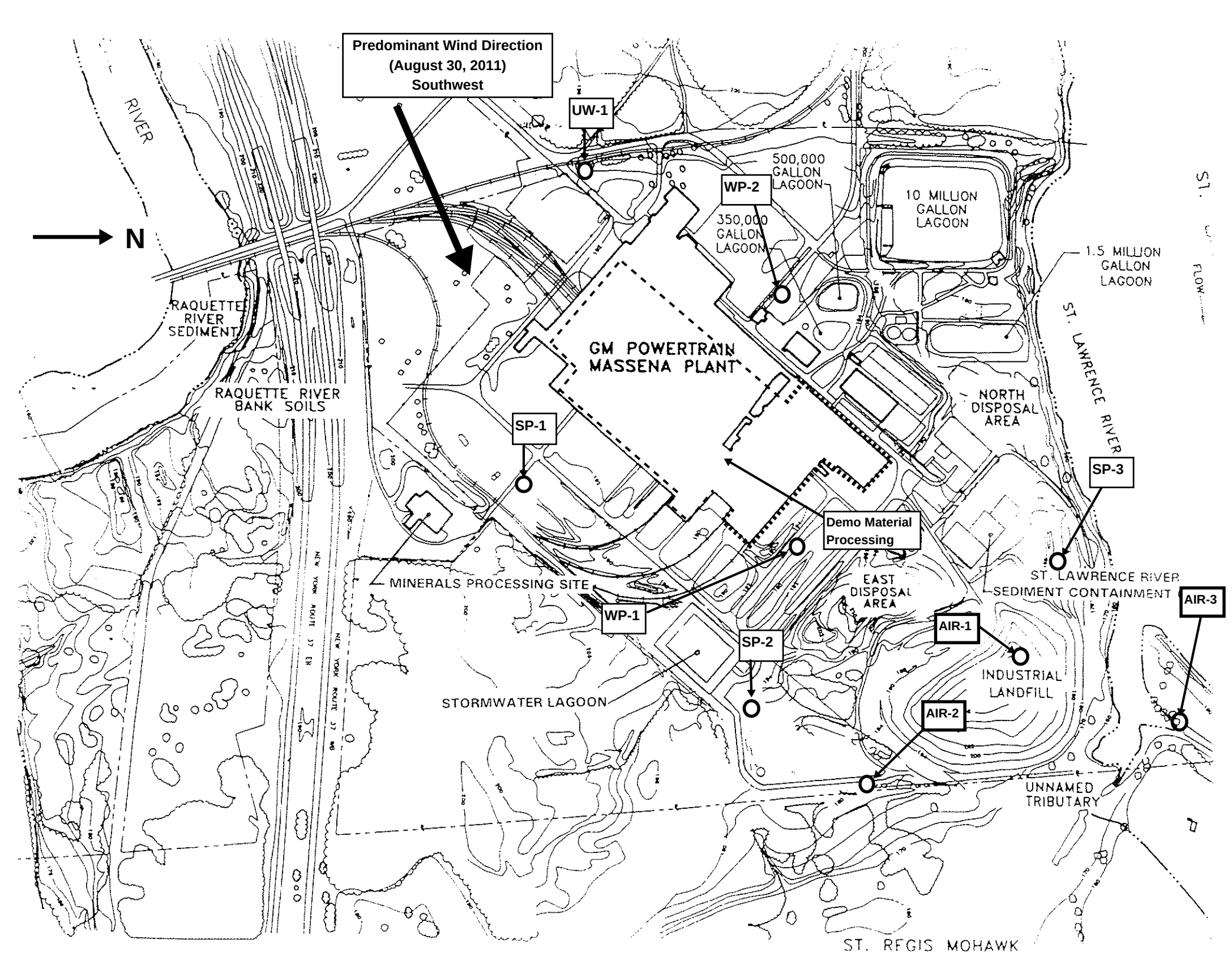
CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	30	0.0
Minimum Instantaneous	10	0.0
Maximum Instantaneous	45	0.0
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	61	0.4
Minimum Instantaneous	11	0.0
Maximum Instantaneous	187	0.3
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	35	0.2
Minimum Instantaneous	11	0.0
Maximum Instantaneous	146	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	25	0.3
Minimum Instantaneous	10	0.0
Maximum Instantaneous	45	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	21	0.0
Minimum Instantaneous	5	0.0
Maximum Instantaneous	39	0.0
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	32	0.3
Minimum Instantaneous	9	0.0
Maximum Instantaneous	58	0.3
AIR-1		
Maximum 15 Minute TWA	31	NM
Minimum Instantaneous	9	NM
Maximum Instantaneous	51	NM
AIR-2		
Maximum 15 Minute TWA	31	NM
Minimum Instantaneous	11	NM
Maximum Instantaneous	40	NM
AIR-3		
Maximum 15 Minute TWA	27	NM
Minimum Instantaneous	9	NM
Maximum Instantaneous	36	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.
>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.
>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
(August 30, 2011)
Southwest
N
UW-1
WP-2
500,000
GALLON
LAGOON
10 MILLION
GALLON
LAGOON
350,000
GALLON
LAGOON
1.5 MILLION
GALLON
LAGOON
RAQUETTE
RIVER
SEDIMENT
RAQUETTE RIVER
BANK SOILS
GM POWERTRAIN
MASSENA PLANT
NORTH
DISPOSAL
AREA
ST. LAWRENCE RIVER
SP-1
SP-3
Demo Material
Processing
MINERALS PROCESSING SITE
WP-1
EAST
DISPOSAL
AREA
ST. LAWRENCE RIVER
SEDIMENT CONTAINMENT
AIR-3
AIR-1
SP-2
INDUSTRIAL
LANDFILL
STORMWATER LAGOON
AIR-2
UNNAMED
TRIBUTARY
ST. REGIS MOHAWK

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08302011-00122 **Date:** August 30, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (32)
Subcontractors: Op Tech (1)
Perras (2)
Heritage (3)

Weather/Wind: Overcast/Rain, 57to 76 degrees F with wind out of the SW at 5 to 7 mph with gusts up to 17 mph. .25“ of precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- The topic of the health and safety for today was personnel health. The importance of eating healthy, not using tobacco products and limited consumption of alcohol.
- Being at your healthy weight will prevent employees from getting hurt on the job.
- Torch cutter must use clean respirators and green coveralls when ever burning on steel inside or outside the TSCA exclusion zone.
- Any torch cutting activity outside a designated burning field must be accompanied by a hot work permit.

Work Activities Summary:

Brandenburg

- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with one hydraulic shear.
- Wrecking low bays in TSCA exclusion zone at column line C/D from 11 to 17.
- Wrecking administration building from column line QQ – MM from column 7 to 1.
- Hand cleaning roofing material in area for asbestos visual inspection.
- Torch cutting in designated burn field on the east side of the building footprint.
- Shearing P&S iron in lay down area with one shear.
- Sorting metals from C&D piles and separating stainless steel material with grapple.
- Wire stripping activity inside door #42 in the TSCA exclusion zone.
- Loaded seventeen loads of TSCA soil at cell#3
- Loaded seventeen intermodal containers with TSCA debris in reduction zone at column line #29.
- Loaded nine railcars with clean P&S and #1 iron.

Op Tech

- Overseeing asbestos roofing material removal as part of demolition activity.
- Cleaning up and inspecting asbestos exclusion zone.

Heritage

- Rotating intermodal containers to the cell #3 loading area and to column #29 TSCA debris load out area at column #29.

6723 Towpath Road, P.O. Box 66, Syracuse, NY 13214-0066
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- Obtaining weights for soil and debris that is loaded into intermodal containers.
- Loaded two rail cars with eleven intermodal containers.
- Manifesting and inspecting loads.

Perras
- Driving trucks and tarping loads at the direction of Heritage supervision.

Waste Materials Removed:
Shipped two Heritage rail cars out with 11 intermodal containers to Heritage Landfill in Indiana. Shipped three 100 cu yd trailers with C&D material to Ontario County Landfill. Shipped one 100 cu yd trailer with non friable asbestos and C&D material to Ontario County Landfill. Shipped nine railcars of clean P&S and #1 iron to Gerdau.

Samples Collected, Requested/Received Analytical Results:
None.

Issues and Concerns:
None

Resolutions to Issues and Concerns:
None

Potential Delays:
None determined at this time.

Supplemental Information:
- See Brandenburg Daily Log for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Wednesday, October 19, 2011 4:22 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino
Cc: Casey, Dan; Brendan Mullen; Kemp, Dan; Carrillo-Sheridan, Margaret; David Grant
Subject: Exceedance Notification Documentation
Attachments: Exceedance-Notification 10-7-8-11.pdf

Anne,

Attached please find a notice of monitoring results from Air Station #1 located at the top of the ILF for October 7 and 8. The analytical result was 0.2760 ug/m^3, which is above the site specific action level of 0.11 ug/m^3 . The action items established and high volume air monitoring will continue.

If you have any further questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

ARCADIS of New York, Inc. | c/o RACER Trust - 56 Chevrolet Road, Route 37 | Massena, NY, 13662
T. 315.764.2299 | M. 315.447.3217 |
www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **10/17/2011**

I. Identification of : **X** *Exceedance* _____ *Near Exceedance*

Environmental Monitoring Parameter:

_____ Particulate Dust **x** PCBs in Air _____ VOCs

Date of Exceedance: 10/7/11 and 10/8/11 ***Time of Exceedance/Near Exceedance:*** Two consecutive

24 hour samples both collected from Air Station 1; the first collected from 7:28 am on 10/7/11 to 17:14 pm on 10/7/11 and the second (also from AIR-1) collected from 17:19 pm on 10/7/11 to 14:45 pm on 10/8/11.

Analytical Result (from 10/7/11): 0.2760 ug/m^3 ***Action Level:*** 0.11 ug/m3

Analytical Result (from 10/8/11): 0.2130 ug/m^3 ***Action Level:*** 0.11 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

The 2 exceedances are from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers work activities from Brandenburg for 2 days (10/7/11) and (10/8/11). On 10/7/11, Brandenburg loaded a total of 9 intemodal containers with soil from Cell #3 and moved the entire TSCA pile within the TSCA exclusion zone with the 924 excavator and the 973 loader. On 10/8/11, Brandenburg loaded PCB-containing soil into 16 intermodal containers from Cell #3. Air monitoring station #1 is approximately 280 feet downwind from Cell #3 Wind gusts were logged up to 18 mph on 10/7/11 with an average wind speed of 3.7 mph. On 10/8/11, wind gusts were logged up to 21 mph with an average wind speed of 5.3 mph.

Brandenburg Representative Notified: *John Williams*
Date: 10/17/2011 *Time:* 4:35 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 10/17/2011 *Time:* 9:36 AM

Immediate Action(s) Required: X *Yes* _____ *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedances and near exceedances:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
5). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
6). Obtained software upgrade for the weather station to notify via email and audio alarm in the event of sustained high winds.
7).ARCADIS will notify Brandenburg to shut down when sustained winds greater than 15 mph are occurring.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of additional NIOSH 5503 for PCBs in air at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant.
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these short term actions will continue. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedances to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 10/19/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
168	AIR1-09272011	9/27/2011	218	1369	298,050.5	0.07	0.11	0.0209 AP
169	AIR2-09272011	9/27/2011	213	1347	287,217.7	0.07	0.11	0.0109 AP
170	AIR3-09272011	9/27/2011	250	1343	335,544.5	0.07	0.11	0.0050 J,AP
171	AIR1-09282011	9/28/2011	223	1451	323,291.3	0.07	0.11	0.0023 J,AP
172	AIR2-09282011	9/28/2011	222	1408	313,174.0	0.07	0.11	ND
173	AIR3-09282011	9/28/2011	219	1443	316,471.3	0.07	0.11	0.0017 J,AP
174	AIR1-09292011	9/29/2011	222	1409	312,102.7	0.07	0.11	0.0021 J,AP
175	AIR2-09292011	9/29/2011	219	1428	312,040.5	0.07	0.11	0.0028 J,AP
176	AIR3-09292011	9/29/2011	213	1426	303,738.8	0.07	0.11	0.0027 J,AP
177	AIR1-09302011	9/30/2011	221	1421	314,463.6	0.07	0.11	0.0209 AP
178	AIR2-09302011	9/30/2011	221	1430	315,877.3	0.07	0.11	0.0069 J,AP
179	AIR3-09302011	9/30/2011	218	1456	317,254.9	0.07	0.11	0.0146 AP
180	AIR1-10012011	10/1/2011	209	1884	394,114.6	0.07	0.11	0.0980 J,AP
181	AIR2-10012011	10/1/2011	215	1875	402,945.0	0.07	0.11	0.0077 AP
182	AIR3-10012011	10/1/2011	212	1849	391,181.0	0.07	0.11	0.0104 AP
183	AIR4-10012011	10/1/2011	N/A	N/A	392,987.0	0.07	0.11	ND
184	AIR1-10042011	10/4/2011	213	1434	304,759.5	0.07	0.11	ND
185	AIR2-10042011	10/4/2011	222	1436	319,391.1	0.07	0.11	ND
186	AIR3-10042011	10/4/2011	205	1439	295,314.6	0.07	0.11	ND
187	AIR1-10052011	10/5/2011	215	1433	308,003.9	0.07	0.11	0.0076 J,AP
188	AIR2-10052011	10/5/2011	222	1452	322,432.9	0.07	0.11	0.0056 J,AP
189	AIR3-10052011	10/5/2011	223	1434	319,295.9	0.07	0.11	0.0022 J,AP
190	AIR1-10062011	10/6/2011	218	1429	310,837.0	0.07	0.11	0.0022 J,AP
191	AIR2-10062011	10/6/2011	226	1429	322,888.6	0.07	0.11	ND
192	AIR3-10062011	10/6/2011	209	1434	299,396.9	0.07	0.11	ND
193	AIR1-10072011	10/7/2011	211	1437	303,745.7	0.07	0.11	0.0119 AP
194	AIR2-10072011	10/7/2011	221	1437	318,091.4	0.07	0.11	0.0104 J,AP
195	AIR3-10072011	10/7/2011	215	1432	307,798.3	0.07	0.11	0.0035 J,AP
196	AIR1-10072011B	10/7/2011	208	586	122,148.8	0.07	0.11	0.2760 AP
197	AIR2-10072011B	10/7/2011	218	586	128,030.5	0.07	0.11	0.0189 AP
198	AIR3-10072011B	10/7/2011	208	582	120,989.3	0.07	0.11	0.0400 AP
199	AIR1-10082011	10/8/2011	205	1286	263,347.3	0.07	0.11	0.2130 AP
200	AIR2-10082011	10/8/2011	215	1284	275,853.5	0.07	0.11	0.0193 AP
201	AIR3-10082011	10/8/2011	201	1277	256,096.5	0.07	0.11	0.0570 AP
202	AIR1-10112011	10/11/2011	213	1448	307,900.6	0.07	0.11	0.058 J,AP
203	AIR2-10112011	10/11/2011	215	1421	305,310.1	0.07	0.11	0.081 AP
204	AIR3-10112011	10/11/2011	218	1431	312,532.9	0.07	0.11	0.0129 AP
205	AIR4-10112011	10/11/2011	N/A	N/A	300,400.9	0.07	0.11	ND

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-10072011B

GC Semivolatiles

Lot-Sample #...: H1J110404-001 **Work Order #...:** MM3481AA **Matrix.....:** AA
Date Sampled...: 10/07/11 **Date Received..:** 10/11/11
Prep Date.....: 10/11/11 **Analysis Date..:** 10/13/11
Prep Batch #...: 1284045
Dilution Factor: 40.93 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.15	ug/m3
Aroclor 1221	ND	0.082	ug/m3
Aroclor 1232	ND G	0.32	ug/m3
Aroclor 1242	**0.21 AP**	**0.082**	**ug/m3**
Aroclor 1248	**0.066 J,AP**	**0.082**	**ug/m3**
Aroclor 1254	ND	0.082	ug/m3
Aroclor 1260	ND	0.082	ug/m3
Aroclor 1262	ND	0.082	ug/m3
Aroclor 1268	ND	0.082	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(60 - 120)
Decachlorobiphenyl	NC,DIL	(60 - 120)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

J Estimated result. Result is less than RL.

ARCADIS U.S. Inc

Client Sample ID: AIR1-10082011

GC Semivolatiles

Lot-Sample #...: H1J110404-004 **Work Order #...:** MM35C1AA **Matrix.....:** AA
Date Sampled...: 10/08/11 **Date Received..:** 10/11/11
Prep Date.....: 10/11/11 **Analysis Date..:** 10/13/11
Prep Batch #...: 1284045
Dilution Factor: 18.99 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.12	ug/m3
Aroclor 1221	ND	0.038	ug/m3
Aroclor 1232	ND G	0.19	ug/m3
Aroclor 1242	**0.16 AP**	**0.038**	**ug/m3**
Aroclor 1248	**0.053 AP**	**0.038**	**ug/m3**
Aroclor 1254	ND	0.038	ug/m3
Aroclor 1260	ND	0.038	ug/m3
Aroclor 1262	ND	0.038	ug/m3
Aroclor 1268	ND	0.038	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(60 - 120)
Decachlorobiphenyl	NC,DIL	(60 - 120)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection October 7, 2011
Site Weather Conditions Sunny, 41 - 69°F, Predominate wind direction: S, Evening high wind 18 mph
General Site Notes 1) Instantaneous elevated readings at WP-2 resulted from demolition pad clearing activities.
NM = Not Measured 2) The contractor was notified and the conditions were addressed with water.
3) No 15 minute time weighted average was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	16	0.1
Minimum Instantaneous	6	0.0
Maximum Instantaneous	53	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	19	0.2
Minimum Instantaneous	5	0.0
Maximum Instantaneous	95	0.3
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	80	0.2
Minimum Instantaneous	8	0.0
Maximum Instantaneous	163	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	19	0.3
Minimum Instantaneous	7	0.0
Maximum Instantaneous	41	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	14	0.1
Minimum Instantaneous	3	0.0
Maximum Instantaneous	57	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	15	0.3
Minimum Instantaneous	5	0.0
Maximum Instantaneous	19	0.3
AIR-1		
Maximum 15 Minute TWA	22	NM
Minimum Instantaneous	7	NM
Maximum Instantaneous	33	NM
AIR-2		
Maximum 15 Minute TWA	18	NM
Minimum Instantaneous	5	NM
Maximum Instantaneous	23	NM
AIR-3		
Maximum 15 Minute TWA	20	NM
Minimum Instantaneous	7	NM
Maximum Instantaneous	30	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatior
Contractor suspends work, identifies source and addresses issue.

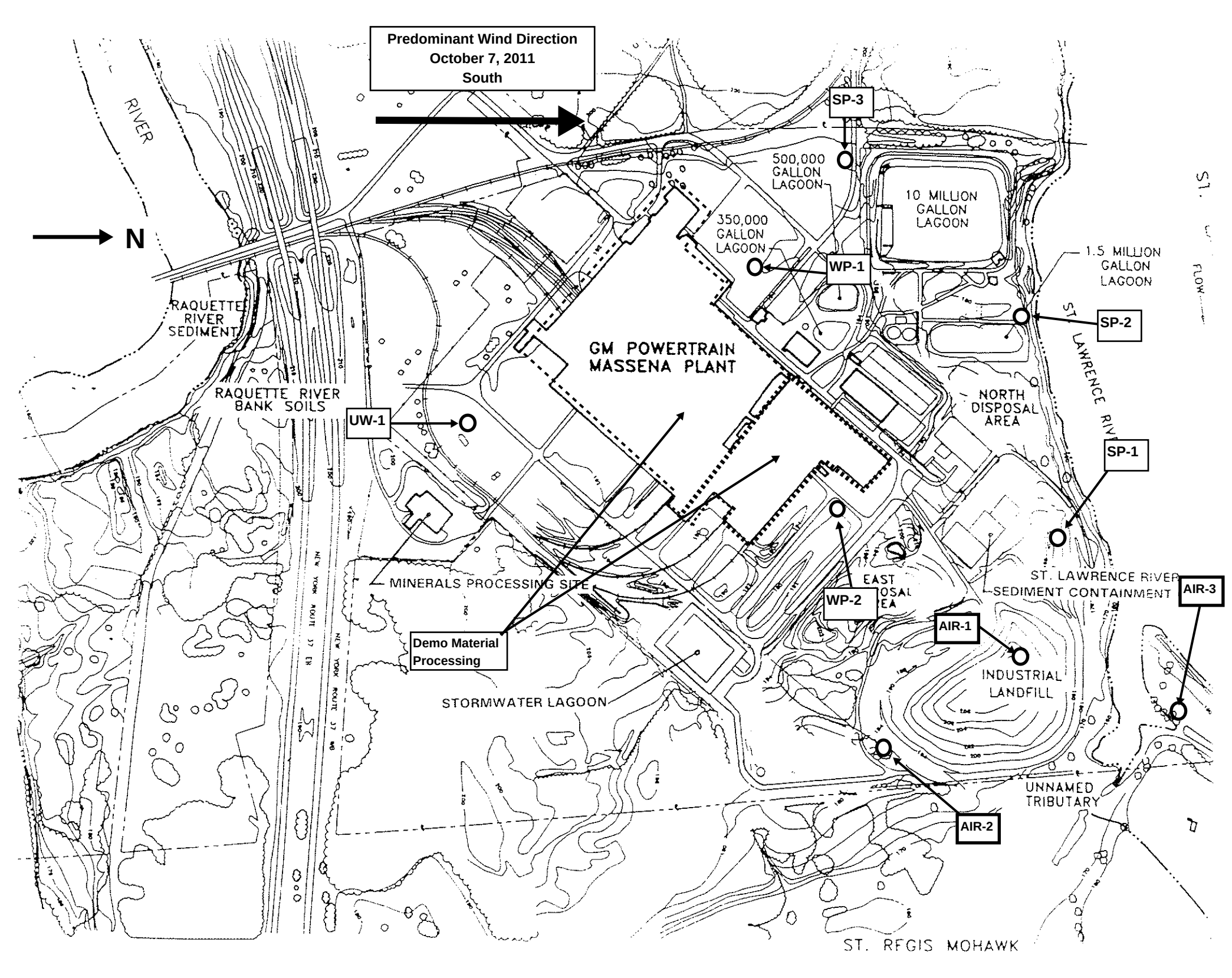
150 µg/m^3 Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatior
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
October 7, 2011
South
N
SP-3
500,000 GALLON LAGOON
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
WP-1
1.5 MILLION GALLON LAGOON
SP-2
ST. LAWRENCE RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
UW-1
SP-1
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
WP-2
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK

Community Air Monitoring Plan - Data Summary

Date of Data Collection October 8, 2011
Site Weather Conditions Sunny, 54 - 78°F, Predominate wind direction: SW, Afternoon high wind 21 mph
General Site Notes 1) Instantaneous elevated readings at WP-1 and WP-2 resulted from dry demolition pad.
NM = Not Measured 2) The contractor was notified and the conditions were addressed with water.
3) No 15 minute time weighted average was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	28	0.3
Minimum Instantaneous	17	0.0
Maximum Instantaneous	49	0.4
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	38	0.3
Minimum Instantaneous	15	0.0
Maximum Instantaneous	137	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	50	0.3
Minimum Instantaneous	16	0.0
Maximum Instantaneous	225	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	27	0.3
Minimum Instantaneous	16	0.0
Maximum Instantaneous	35	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	27	0.2
Minimum Instantaneous	12	0.0
Maximum Instantaneous	59	0.2
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	27	0.4
Minimum Instantaneous	15	0.0
Maximum Instantaneous	39	0.4
AIR-1		
Maximum 15 Minute TWA	43	NM
Minimum Instantaneous	17	NM
Maximum Instantaneous	55	NM
AIR-2		
Maximum 15 Minute TWA	34	NM
Minimum Instantaneous	17	NM
Maximum Instantaneous	47	NM
AIR-3		
Maximum 15 Minute TWA	26	NM
Minimum Instantaneous	15	NM
Maximum Instantaneous	73	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatior
Contractor suspends work, identifies source and addresses issue.

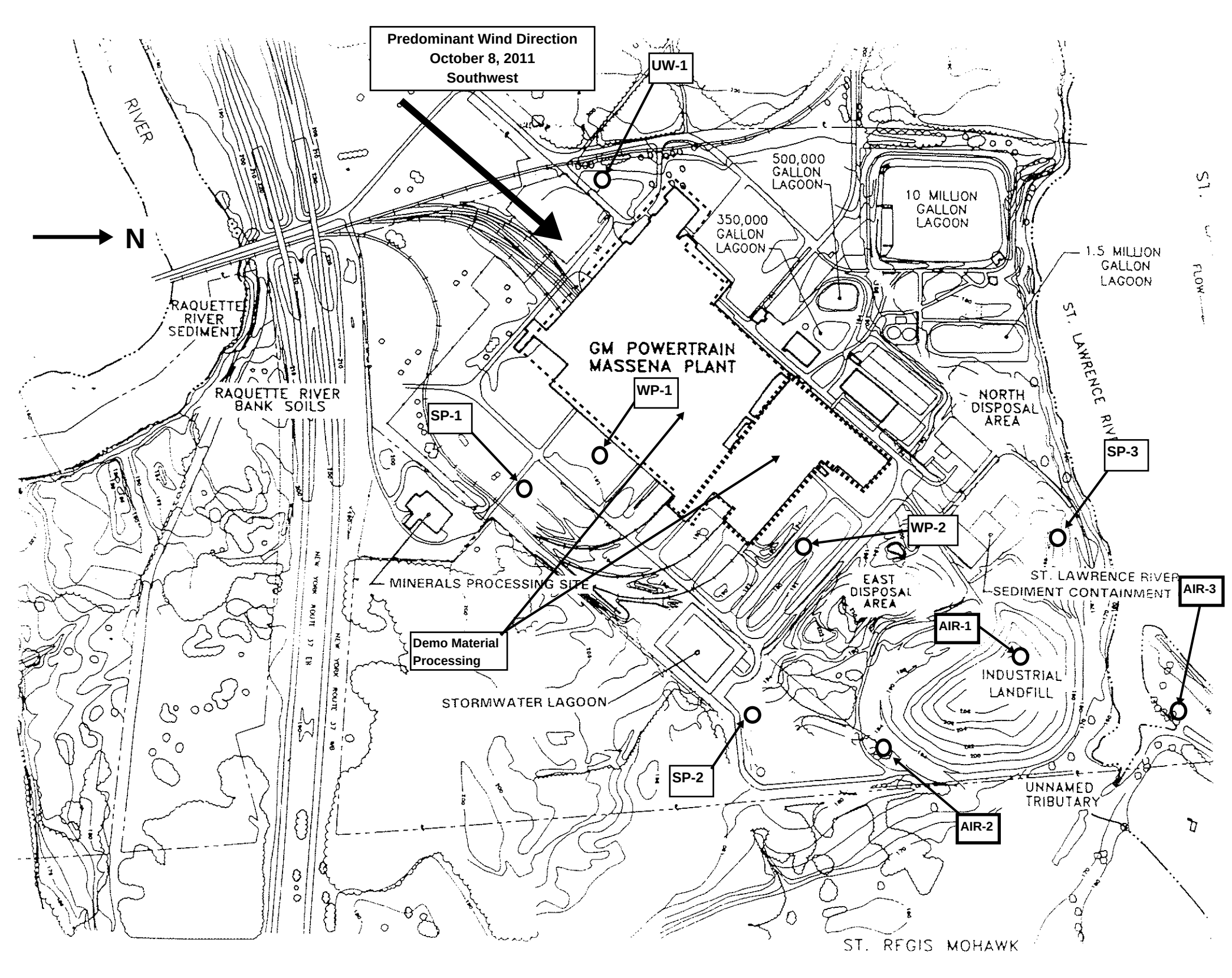
150 µg/m^3 Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatior
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
October 8, 2011
Southwest
N
UW-1
500,000 GALLON LAGOON
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
1.5 MILLION GALLON LAGOON
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
GM POWERTRAIN MASSENA PLANT
WP-1
SP-1
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-3
WP-2
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
SP-2
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-10072011-00152 **Date:** October 7, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (3)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (25)
Subcontractors: Heritage (3)
Perras (2)
S&L (1)

Weather/Wind: Sunny \ 41 to 69° F \ Wind out of the SW at 1 to 5 miles per hour. Wind gust up to 18 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Employees working in the Tunnel area must wear proper PPE including respirator protection.
- All employees must practice good hygiene habits in order to prevent.
- John J. that drives the water truck discussed the issue of open holes. He drives the truck at 6am to get ahead of the dust issues. He told the crew that his visibility is impaired by darkness and that it is important that each employee is vigilant about keeping covers on openings in the slab that might have been removed during the course of work during the day.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with one hydraulic shears.
- Moving entire TSCA pile from the location in the middle of the TSCA area to column line M with 954 excavator and 973 loader. This will centralize all TSCA material in one location.
- Loaded 9 HESX intermodal containers with soil from Cell #3.
- No Torch cutting.
- Using UP 90 concrete pulverizer and 954 excavator with magnet to process rubble for hard fill crushing operation.
- Completed removing pipes from tunnel running from WWTP to the main structure.
- Removing piping from large die cast tunnels.
- Slab cleaning is TSCA area. This includes washing down with fire hose and sweeping with skid steer attachment.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Each load is weighed to calculate soil weights.
- Loaded 3 HESX rail cars with 15 intermodal containers. Manifested by Heritage and inspected by ARCADIS.

Perras

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- Driving and tarping loads of TSCA soil from Cell #3 under the direction of Heritage.

S&L Electric

- Working on electrical issues associated with wire stripping operation.

Waste Materials Removed:
None

Samples Collected, Requested/Received Analytical Results:
Wipe samples collected from 973 loader, United Rental Generator, and Dust Boss.

Issues and Concerns:
None

Resolutions to Issues and Concerns:
None

Potential Delays:
None determined at this time.

Supplemental Information:

- See Brandenburg Daily Log (attached) for additional details of site activities.

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-10072011-00153 **Date:** October 8, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (2)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1530**

Contractor: Brandenburg (25)
Subcontractors: Heritage (3)
Perras (2)

Weather/Wind: Mostly Sunny \ 54 to 78° F \ Wind out of the SW at 4 to 9 miles per hour. Wind gust up to 21 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Our largest safety concern today is complacency.
- Use the proper PPE for the tasks that you are performing.
- Respirators must be kept in clean condition and stored properly. Employees must be clean shaven daily.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with one hydraulic shears.
- Loaded 16 HESX intermodal containers with soil from Cell #3.
- No Torch cutting.
- Wire Stripping operation up and running
- Continued using UP 90 concrete pulverizer and 954 excavator with magnet to process rubble for hard fill crushing operation. The pulverizing was suspended due to blown cylinder seal.
- Removing piping from large die cast tunnels.
- Removing loading dock at garage area.
- Slab cleaning is TSCA area. The slab clean is achieved by wetting down with fire hose and sweeping with skid steer attachment in a systematic fashion.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Each load is weighed to calculate soil weights.
- Loaded 4 HESX rail cars with 22 intermodal containers. Manifested by Heritage and inspected by ARCADIS.

Perras

- Driving and tarping loads of TSCA soil from Cell #3 under the direction of Heritage.

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Waste Materials Removed: None
Samples Collected, Requested/Received Analytical Results: Wipe samples collected from 973 loader, United Rental Generator, and Dust Boss.
Issues and Concerns: Pulverizer blew seal on cylinder.
Resolutions to Issues and Concerns: Replacement cylinder scheduled for Monday.
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Friday, August 19, 2011 3:13 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino; Brendan Mullen; 'Peter Ouderkirk'; 'Craig Arquette'
Cc: Casey, Dan; Carrillo-Sheridan, Margaret; Kemp, Dan; David Grant
Subject: Near Exceedance Notification
Attachments: Near Exceedance Notification_081111.pdf

All,

Please see attached notice of monitoring results from Air Station 1 located at the top of the ILF for August 11, 2011. This is not an exceedance of the established 0.11 ug/m^3 action level. The previous day (8/10/11) had established new corrective actions to that event which are currently being implemented. No other air monitoring locations identified an issue on either date.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

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RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **8/18/2011**

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 8/11/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:15 am on 8/11/11 to 7:07 am on 8/12/11 from Air Station #1.

Analytical Result (or measurement): 0.094 ug/m^3 ***Evaluation Action Level:*** .07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

The near exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBS using USEPA Method TO-4a. Brandenburg was loading soil into intermodal containers at cell #3. A total 10 intermodal containers were loaded with PCB-containing soil from cell #3 during the day. Air monitoring station #1 is approx. 400-feet away and directly downwind from where the loading occurred. This near exceedance is lower than the previous day which exceeded the higher action level (0.11 ug/M^3). Wind gusts were logged up to 19 mph this day. Based on the data and wind direction, indicated that the work activities at Cell #3 are the likely source of the exceedance

Brandenburg Representative Notified: *Mike Massiello*
Date: 8/18/2011 *Time:* 5:15 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 8/18/2011 *Time:* 4:50 PM

Immediate Action(s) Required: ***X*** *Yes* ____ *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions are being taken from the previous exceedance:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm. Additional
3). Operational shutdown with sustained winds greater than 25 hph.
4). Increased watering of the piles and/or roadway.

Additional measures include:

5). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
6). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
7). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.

These actions will be re-evaluated to see if they are effective in preventing exceedances or near exceedances.

Long Term Action Taken:

Date of Action: ____ *Confirmed by:* *Richard Boelter*

III. Verification of Corrective Action(s)

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
59	AIR3-08052011	8/5/2011	260	1189	309,446.4	0.07	0.11	0.0057 J,AP
60	AIR4-08052011	8/5/2011	N/A	N/A	354,853.1	0.07	0.11	ND
61	AIR1-08062011	8/6/2011	243	2037	495,148.7	0.07	0.11	0.0187 AP
62	AIR2-08062011	8/6/2011	236	2037	481,660.6	0.07	0.11	0.0064 AP
63	AIR3-08062011	8/6/2011	236	1996	471,534.8	0.07	0.11	0.0067 AP
64	AIR1-08092011	8/9/2011	278	1453	403,265.5	0.07	0.11	0.0069 AP
65	AIR2-08092011	8/9/2011	282	1453	409,820.8	0.07	0.11	0.0052 J, AP
66	AIR3-08092011	8/9/2011	262	1440	377,097.8	0.07	0.11	0.0027 J, AP
67	AIR1-08102011	8/10/2011	267	1432	381,739.0	0.07	0.11	0.0135 AP
68	AIR2-08102011	8/10/2011	283	1433	405,673.2	0.07	0.11	0.0070 AP
69	AIR3-08102011	8/10/2011	270	1425	384,611.1	0.07	0.11	0.0062 J, AP
70	AIR1-08112011	8/11/2011	279	1428	398,989.8	0.07	0.11	0.134 AP
71	AIR2-08112011	8/11/2011	286	1420	406,765.8	0.07	0.11	0.0117 AP
72	AIR3-08112011	8/11/2011	269	1432	385,317.3	0.07	0.11	0.0304 AP
73	AIR1-08122011	8/12/2011	274	1432	392,710.8	0.07	0.11	0.094 J, AP
74	AIR2-08122011	8/12/2011	291	184	53,561.0	0.07	0.11	0.0357 J, AP
75	AIR3-08122011	8/12/2011	262	1413	369,572.4	0.07	0.11	0.0139 AP
76	AIR4-08122011	8/12/2011	N/A	N/A	371,111.5	0.07	0.11	ND

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

ND = Not Detected above laboratory reporting limit

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-08122011

GC Semivolatiles

Lot-Sample #...: H1H140408-001 **Work Order #...:** MLMPV1AA **Matrix.....:** AA
Date Sampled...: 08/12/11 **Date Received..:** 08/13/11
Prep Date.....: 08/15/11 **Analysis Date..:** 08/17/11
Prep Batch #...: 1227096
Dilution Factor: 12.73 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.056	ug/m3
Aroclor 1221	ND	0.025	ug/m3
Aroclor 1232	ND G	0.091	ug/m3
Aroclor 1242	**0.070 AP**	**0.025**	**ug/m3**
Aroclor 1248	**0.024 J,AP**	**0.025**	**ug/m3**
Aroclor 1254	ND	0.025	ug/m3
Aroclor 1260	ND	0.025	ug/m3
Aroclor 1262	ND	0.025	ug/m3
Aroclor 1268	ND	0.025	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

J Estimated result. Result is less than RL.

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 11, 2011
Site Weather Conditions Broken Cloud, 61 - 69°F, Predominate wind direction: WSW, Morning high wind 19 mph
General Site Notes 1) Elevated readings at WP-1 and WP-2 resulted from railcar loading activites.
NM = Not Measured 2) Conditions were addressed with water. No 15 minute TWA was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	20	0.1
Minimum Instantaneous	4	0.0
Maximum Instantaneous	42	0.2
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	29	0.4
Minimum Instantaneous	4	0.0
Maximum Instantaneous	100	0.5
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	99	0.2
Minimum Instantaneous	6	0.0
Maximum Instantaneous	557	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	18	0.5
Minimum Instantaneous	3	0.0
Maximum Instantaneous	65	0.5
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	15	0.1
Minimum Instantaneous	2	0.0
Maximum Instantaneous	24	0.2
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	12	0.3
Minimum Instantaneous	4	0.0
Maximum Instantaneous	27	0.3
AIR-1		
Maximum 15 Minute TWA	21	NM
Minimum Instantaneous	5	NM
Maximum Instantaneous	33	NM
AIR-2		
Maximum 15 Minute TWA	15	NM
Minimum Instantaneous	4	NM
Maximum Instantaneous	44	NM
AIR-3		
Maximum 15 Minute TWA	12	NM
Minimum Instantaneous	3	NM
Maximum Instantaneous	20	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatic
Contractor suspends work, identifies source and addresses issue.

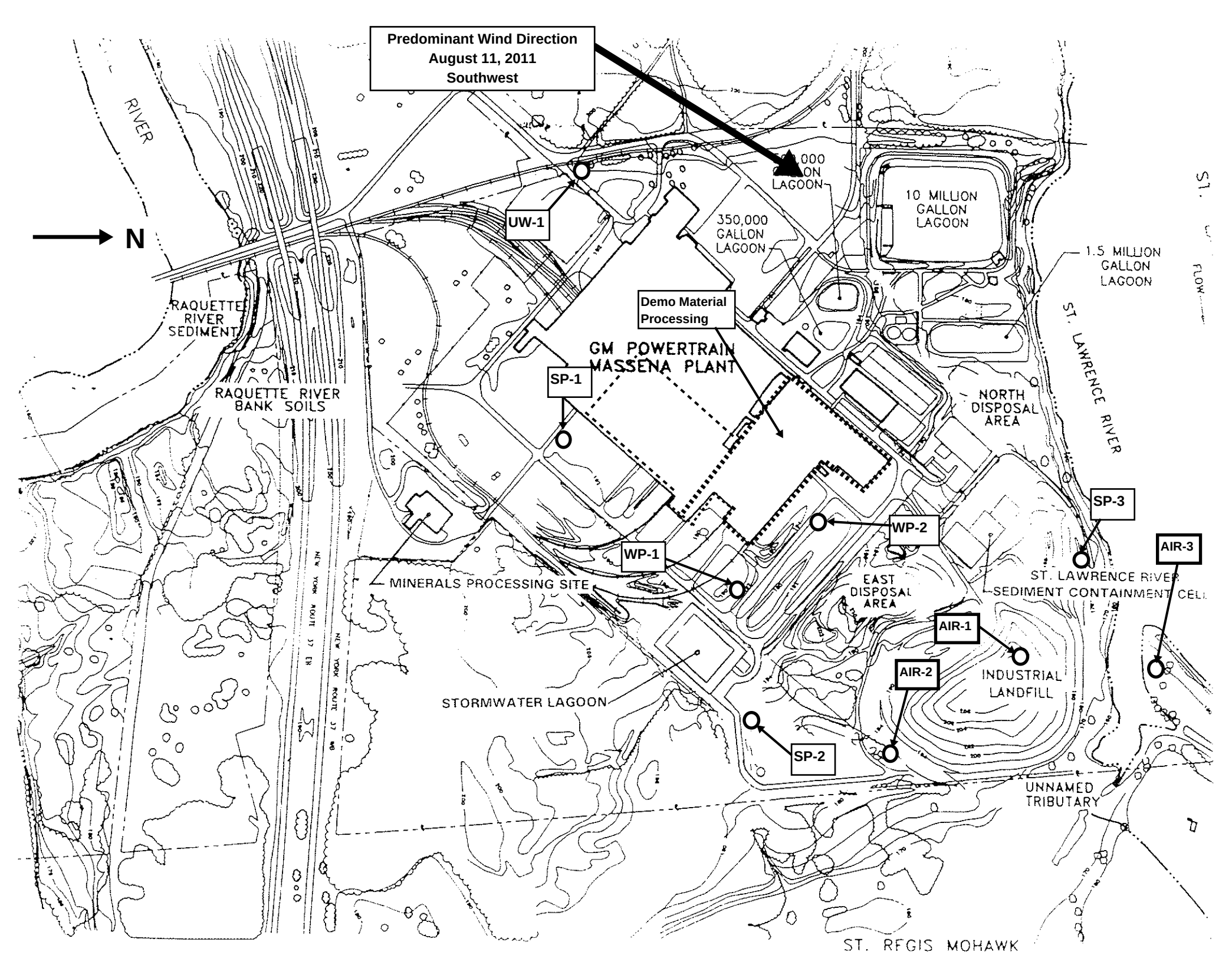
150 µg/m^3 Above background concentrations observed at upwind locatic
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatic
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatic
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
August 11, 2011
Southwest
N
UW-1
SP-1
SP-2
SP-3
WP-1
WP-2
AIR-1
AIR-2
AIR-3
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
1.5 MILLION GALLON LAGOON
Demo Material Processing
GM POWERTRAIN MASSENA PLANT
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
MINERALS PROCESSING SITE
STORMWATER LAGOON
NORTH DISPOSAL AREA
EAST DISPOSAL AREA
INDUSTRIAL LANDFILL
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT CELL
ST. LAWRENCE RIVER
UNNAMED TRIBUTARY
ST. REGIS MOHAWK
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NEW YORK ROUTE 37 WB

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08112011-00106 **Date:** August 11, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (32)
Subcontractors: Heritage (2)
Perras (2)

Weather/Wind Overcast / PM Rain 61 to 70 degrees F. with wind out of the WSW at 4 to 11 mph, gusting to 19 mph. .04" of precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- All basic PPE must be worn by all personnel on site. Hard hats, safety glasses, safety shoes, and florescent vest must be worn by anyone on site.
- Provisions for decontaminating 984 excavator must be in place before any cleaning activity takes place.
- Due to Industrial Landfill incident make sure that you have identification and site badge with you when you leave site.

Work Activities Summary:

Brandenburg

- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with hydraulic shear.
- Shearing P&S and #1 iron in lay down area.
- Wrecking on high bay area at column line K/J from 19 to 13.
- Wrecking low bay 9/7 from D to G with 954 excavator.
- Two shears prepping P&S and #1 iron in lay down area.
- Loaded soil into 10 intermodal containers at Cell #3
- Loaded 10 intermodal containers with TSCA steel / debris at column M load out area.
- Sorting metals from C&D piles and separating stainless steel material with grapple and magnet.
- Loading railcars with clean scrap.
- Loaded two 100 cy trailers with C&D material.
- Segregated railcar that had contaminated soil put in it.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Transporting containers to column M for TSCA demolition debris. Each load is weighed to calculate soil and debris weights.
- Loaded 2 rail cars with 14 intermodal containers. Manifested by Heritage and inspected by ARCADIS.

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Waste Materials Removed: Four BISCO dump trailers loaded with bailing material shipped to Ben Weisman Scrap yard in Owego NY. Two 100 cy trailers of C&D material shipped to Ontario County Landfill. 2 Heritage rail cars of TSCA material shipped out to Heritage Landfill in Indian. Two clean scrap rail cars with P&S and #1 was shipped.
Samples Collected, Requested/Received Analytical Results: None
Issues and Concerns: Landfill incident
Resolutions to Issues and Concerns: Authorities took care of issue.
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Friday, August 26, 2011 4:43 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino; Brendan Mullen; 'Craig Arquette'
Cc: Casey, Dan; Carrillo-Sheridan, Margaret; Kemp, Dan; David Grant
Subject: Near Exceedance Notification
Attachments: Near Exceedance Notification_81811.pdf

All,

Please see the attached notice of monitoring results from Air Station 1 located at the top of the ILF for August 18, 2011. This is a near exceedance slightly above the established evaluation level of 0.07 ug/m^3 . No other air monitoring locations identified an issue on either date.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

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RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **8/25/2011**

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 8/18/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:39 am on 8/18/11 to 7:24 am on 8/19/11 from Air Station #1.

Analytical Result (or measurement): 0.078 ug/m^3 ***Evaluation Action Level:*** .07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This near exceedance is again from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. Brandenburg was loading soil into intermodal containers at cell #3. A total 10 intermodal containers were loaded with PCB-containing soil from Cell #3 during the day. Air monitoring station #1 is approx. 400-feet away and directly downwind from where the loading occurred. This near exceedance is just above the lower evalution level (0.07 ug/M^3). Wind gusts were logged up to 21 mph this day. There was also a dust exceedance above the 100 ug/M^3 at Work Perimeter Station 1 of 179 ug/M^3 . The source of the near exceedance could have come from either area.

Brandenburg Representative Notified: *Mike Massiello*
Date: 8/25/2011 *Time:* 4:50 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 8/25/2011 *Time:* 4:30 PM

Immediate Action(s) Required: ***X*** *Yes* ____ *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedance or near exceedance:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.

New additional measures include:

7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Setting a notification level of 50 ug/M^3 at Air Station 1 and notifying Brandenburg if this level is exceeded for potential further action(s).

These actions will be re-evaluated to see if they are effective in preventing exceedances or near exceedances.

Long Term Action Taken:

Date of Action: 8/26/2011 *Confirmed by:* *Richard Boelter*

III. Verification of Corrective Action(s)

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
64	AIR1-08092011	8/9/2011	278	1453	403,265.5	0.07	0.11	0.0069 AP
65	AIR2-08092011	8/9/2011	282	1453	409,820.8	0.07	0.11	0.0052 J,AP
66	AIR3-08092011	8/9/2011	262	1440	377,097.8	0.07	0.11	0.0027 J,AP
67	AIR1-08102011	8/10/2011	267	1432	381,739.0	0.07	0.11	0.0135 AP
68	AIR2-08102011	8/10/2011	283	1433	405,673.2	0.07	0.11	0.0070 AP
69	AIR3-08102011	8/10/2011	270	1425	384,611.1	0.07	0.11	0.0062 J,AP
70	AIR1-08112011	8/11/2011	279	1428	398,989.8	0.07	0.11	0.134 AP
71	AIR2-08112011	8/11/2011	286	1420	406,765.8	0.07	0.11	0.0117 AP
72	AIR3-08112011	8/11/2011	269	1432	385,317.3	0.07	0.11	0.0304 AP
73	AIR1-08122011	8/12/2011	274	1432	392,710.8	0.07	0.11	0.0940 J,AP
74	AIR2-08122011	8/12/2011	291	184	53,561.0	0.07	0.11	0.0357 J,AP
75	AIR3-08122011	8/12/2011	262	1413	369,572.4	0.07	0.11	0.0139 AP
76	AIR4-08122011	8/12/2011	N/A	N/A	371,111.5	0.07	0.11	ND
77	AIR1-08132011	8/13/2011	260	1908	496,228.8	0.07	0.11	0.0310 AP
78	AIR2-08132011	8/13/2011	279	1872	522,453.5	0.07	0.11	0.0104 AP
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88	AIR3-08182011	8/18/2011	269	1428	384,064.2	0.07	0.11	0.0063 J,AP
89	AIR1-08192011	8/19/2011	242	1425	344,182.6	0.07	0.11	0.078 AP
90	AIR2-08192011	8/19/2011	242	1425	345,150.2	0.07	0.11	0.034 J,AP
91	AIR3-08192011	8/19/2011	264	1427	377,227.5	0.07	0.11	0.0099 AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

ND = Not Detected above laboratory reporting limit

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-08192011

GC Semivolatiles

Lot-Sample #...: H1H200402-001 **Work Order #...:** MLVMF1AA **Matrix.....:** AA
Date Sampled...: 08/19/11 **Date Received..:** 08/20/11
Prep Date.....: 08/22/11 **Analysis Date..:** 08/24/11
Prep Batch #...: 1234048
Dilution Factor: 7.26 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.034	ug/m3
Aroclor 1221	ND	0.015	ug/m3
Aroclor 1232	ND G	0.082	ug/m3
Aroclor 1242	**0.054 AP**	**0.015**	**ug/m3**
Aroclor 1248	**0.024 AP**	**0.015**	**ug/m3**
Aroclor 1254	ND	0.015	ug/m3
Aroclor 1260	ND	0.015	ug/m3
Aroclor 1262	ND	0.015	ug/m3
Aroclor 1268	ND	0.015	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	110	(47 - 122)
Decachlorobiphenyl	107	(66 - 111)

NOTE(S):

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 18, 2011
Site Weather Conditions Sunny, 63 - 83°F, Predominate wind direction: SSE, Afternoon high wind 21 mph
General Site Notes
1) Elevated readings at WP-1 and WP-2 resulted from dry demolition pad
2) Elevated readings at SP-1 and SP-2 resulted from dry perimeter roads.
3) Dust suppresion efficency has decreased as the amount of exposed demolition pad and site activites has increased.
4) 15 minute TWA was exceeded at WP-1 from 13:41 to 13:55, 14:26 to 14:40, and 16:41 to 16:55
5) Contractor was notified and the conditions were addressed with water.
When compared to the corresponding measurement at the Upwind station for the 15 minute TWA, The upper limit of 150 µg/m3 was not exceeded and SP locations were not exceeded.

NM = Not Measured

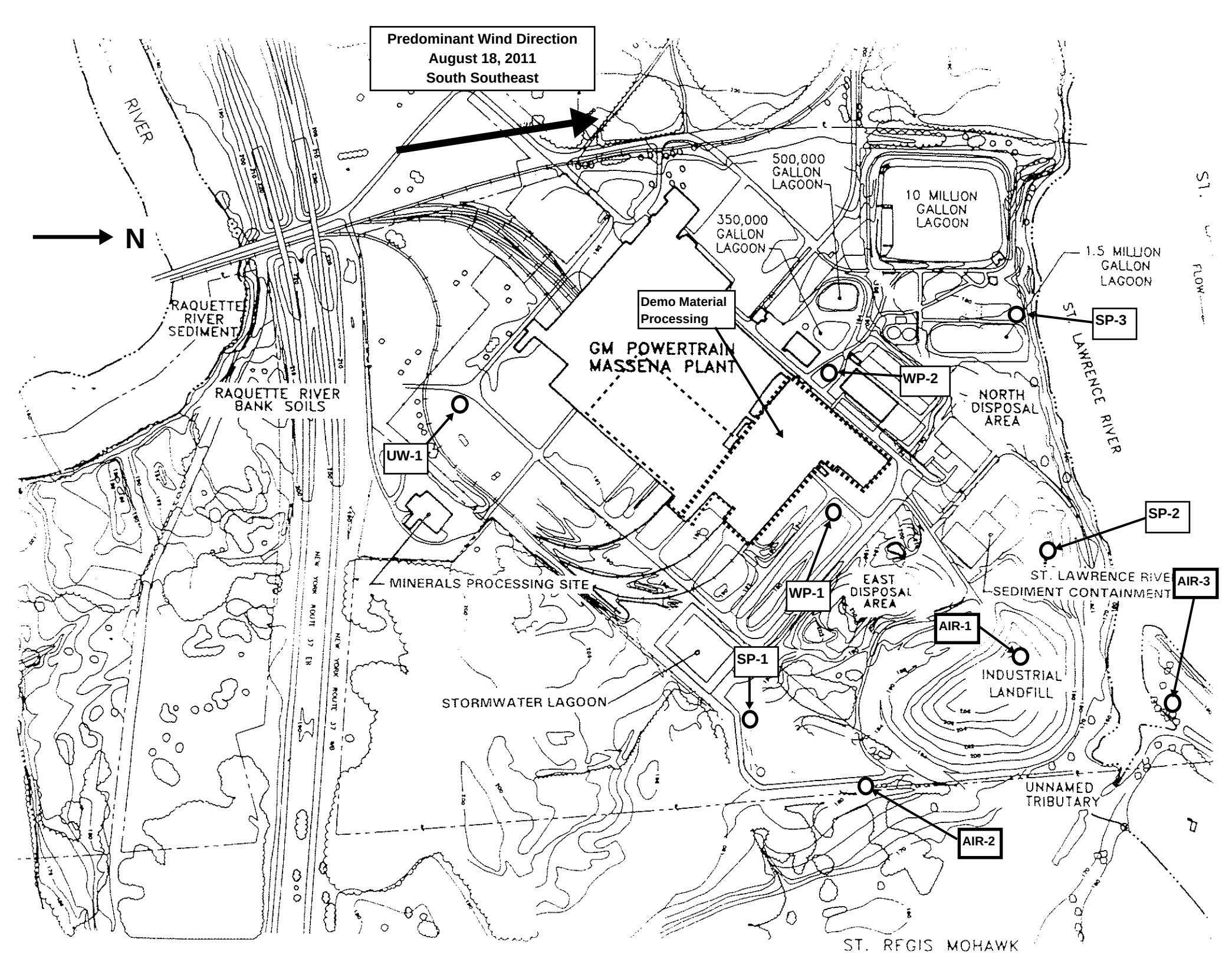
CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	46	0.1
Minimum Instantaneous	28	0.0
Maximum Instantaneous	52	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	179	0.4
Minimum Instantaneous	29	0.0
Maximum Instantaneous	743	0.5
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	50	0.3
Minimum Instantaneous	27	0.0
Maximum Instantaneous	196	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	49	0.4
Minimum Instantaneous	26	0.0
Maximum Instantaneous	115	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	48	0.2
Minimum Instantaneous	22	0.0
Maximum Instantaneous	100	0.2
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	36	0.3
Minimum Instantaneous	24	0.0
Maximum Instantaneous	59	0.4
AIR-1		
Maximum 15 Minute TWA	61	NM
Minimum Instantaneous	29	NM
Maximum Instantaneous	77	NM
AIR-2		
Maximum 15 Minute TWA	44	NM
Minimum Instantaneous	26	NM
Maximum Instantaneous	55	NM
AIR-3		
Maximum 15 Minute TWA	47	NM
Minimum Instantaneous	26	NM
Maximum Instantaneous	55	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locati
Contractor suspends work, identifies source and addresses issue.
150 µg/m^3 Above background concentrations observed at upwind locati
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locati
Contractor suspends work until concentrations return to <5 ppm above background.
>5 ppm and <25 ppm Above background concentrations observed at upwind locati
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.
>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
August 18, 2011
South Southeast
N
RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
500,000 GALLON LAGOON
350,000 GALLON LAGOON
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
Demo Material Processing
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
EAST DISPOSAL AREA
ST. LAWRENCE RIVER
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
MINERALS PROCESSING SITE
STORMWATER LAGOON
INDUSTRIAL LANDFILL
UNNAMED TRIBUTARY
ST. REGIS MOHAWK
NEW YORK ROUTE 37 ER
NEW YORK ROUTE 37 WB
UW-1
WP-1
WP-2
SP-1
SP-2
SP-3
AIR-1
AIR-2
AIR-3

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Imagine the result

Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08182011-00112 **Date:** August 18, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (34)
Subcontractors: Op Tech (1)
Heritage (1)
Perras (2)

Weather/Wind: Partly Cloudy 63 to 83 degrees F with wind out of the SE at 3 to 10 mph with gusts to 21 mph. No precipitation

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Discussed the exceedances on August 10, 2011 and the methods that must be imposed to reduce the likelihood of any additional exceedances. Keeping the material adequately wet. Wetting down the cover prior installing on the cell.
- Asbestos impacted demolition resumes and so does the red asbestos danger tape. All personnel must adhere to exclusion zone associated with the asbestos containing roofing material. If you have any questions about work in the asbestos exclusion zone you must discuss them with Mark Perry from Op Tech.
- Heritage Truck drives should keep in mind that the basic PPE for the project includes gloves. Drivers performing work should adhere to this policy.
- Heavy Equipment on the project site has back up alarms. If your equipments back up alarm is not functioning please address the issue with Greg the mechanic.

Work Activities Summary:

<u>Brandenburg</u>

- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with two hydraulic shears.
- Continued wrecking chiller building. Working from the west road side. Loaded the material into on site truck and stockpiled back at the laydown yard.
- Wrecking low bays at column line 5/3 from G to D. This wrecking involves asbestos containing roofing material.
- Loaded 10 intermodal containers with soil from cell #3.
- Loaded10 intermodal containers with TSCA debris at column #29
- Torch cutting in designated burn field on the east side of the building footprint.
- Shearing P&S and #1 iron in lay down area with one shear.
- Sorting metals from C&D piles and separating stainless steel material with grapple and magnet.
- Wire stripping activity up and running all day just inside door #42.
- Loaded two trailers with Aluminum into trailers for shipment to United Metals.
- Loading railcars with clean #1 and P&S scrap.
- Loaded two 100 cu yd trailers with C&D

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- Removing transformers from inside door #47 and stock piling in lay down area.

Op Tech
- Overseeing asbestos roofing material removal as part of demolition activity.

Heritage
- Rotating intermodal containers to and from cell #3 and column #29 for loading of soil and debris.
- Weighing each intermodal container for weights to get accurate weights for soil and debris
- Manifesting loads and putting placards on intermodal containers.

Perras
- Two drivers working under the direction of Heritage.

Waste Materials Removed:
Shipped nine rail car loads of clean scrap off site. Shipped two 100 cu yd loads of C&D material out to Ontario County Landfill.

Samples Collected, Requested/Received Analytical Results:
Received results of wipe samples for 984 excavator and shear meet requirements for removal from TSCA area. Received results of wipe samples for Perras equipment and truck used in the landfill correction. All clear for release.

Issues and Concerns:
None

Resolutions to Issues and Concerns:
None

Potential Delays:
None determined at this time.

Supplemental Information:
- See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Monday, September 05, 2011 12:04 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino; Brendan Mullen; 'Craig Arquette'
Cc: Casey, Dan; Carrillo-Sheridan, Margaret; Kemp, Dan; David Grant
Subject: Near Exceedance Notification Documentation
Attachments: Near Exceedance-Notification 8-26-11.pdf

All,

Please see the attached notice of monitoring results from Air Station 1 located at the top of the ILF for August 26 & 27, 2011. This is a near exceedance above the established action level of 0.07 ug/m^3 the following 2 days after the exceedances on August 25. Again, no other air monitoring locations identified an issue on either date.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

ARCADIS of New York, Inc. | c/o RACER Trust - 56 Chevrolet Road, Route 37 | Massena, NY, 13662
T. 315.764.2299 | M. 315.447.3217 |
www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **9/2/2011**

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 8/26/2011 ***Time of Exceedance/Near Exceedance:*** 32 hour sample, collected from 7:02 am on 8/26/11 to 15:03 am on 8/27/11 from Air Station #1.

Analytical Result (or measurement): 0.076 ug/m^3 ***Evaluation Action Level:*** .07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This near exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers work activities from Brandenburg for 2 days (8/26/11 & 8/27/11). Brandenburg loaded PCB-containing soil into 17 intermodal containers on 8/26/11 and into 17 intermodal containers on 8/27/11. Air monitoring station #1 is approx. 400-feet away and downwind from where the loading occurred. Wind gusts were logged up to 17 mph during the sampling interval period. The monitoring period covered 2 days because it was on the weekend (Friday and Saturday).

Brandenburg Representative Notified: *Mike Massiello*
Date: 9/1/2011 *Time:* 5:01 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 9/1/2011 *Time:* 4:58 PM

Immediate Action(s) Required: ***X*** *Yes* ____ *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedance or near exceedance:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

ARCADIS and USEPA will monitor the PCB high volume air analytical results for the next following 5 days and assess at that time whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 9/2/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

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41	AIR3-07262011	7/26/2011	263	1439	378,607.4	0.07	0.11	0.0177 AP
42	AIR1-07272011	7/27/2011	259	1437	371,580.1	0.07	0.11	0.1110 AP
43	AIR2-07272011	7/27/2011	253	1435	363,657.2	0.07	0.11	0.0246 AP
44	AIR3-07272011	7/27/2011	261	1428	372,563.7	0.07	0.11	0.0239 AP
45	AIR1-07282011	7/28/2011	242	2021	488,395.3	0.07	0.11	0.0273 AP
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50	AIR3-08022011	8/2/2011	256	1379	353,209.5	0.07	0.11	0.0158 AP
51	AIR1-08032011	8/3/2011	260	1413	367,387.1	0.07	0.11	0.0074 J,AP
52	AIR2-08032011	8/3/2011	256	1439	368,051.9	0.07	0.11	0.0089 AP
53	AIR3-08032011	8/3/2011	257	1420	365,107.7	0.07	0.11	0.0058 J,AP
54	AIR1-08042011	8/4/2011	262	1436	376,007.2	0.07	0.11	0.0016 J,AP
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57	AIR1-08052011	8/5/2011	266	1432	381,083.0	0.07	0.11	0.0028 J,AP
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88	AIR3-08182011	8/18/2011	269	1428	384,064.2	0.07	0.11	0.0063 J,AP
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97	AIR3-08232011	8/23/2011	279	1434	399,473.0	0.07	0.11	0.0085 J,AP
98	AIR1-08242011	8/24/2011	247	1431	353,818.3	0.07	0.11	0.0580 AP
99	AIR2-08242011	8/24/2011	247	1428	353,048.9	0.07	0.11	0.0065 J,AP
100	AIR3-08242011	8/24/2011	269	1424	382,915.9	0.07	0.11	0.0183 AP
101	AIR1-08252011	8/25/2011	242	1438	347,935.5	0.07	0.11	0.0135 AP
102	AIR2-08252011	8/25/2011	243	1440	349,307.5	0.07	0.11	0.0027 J,AP
103	AIR3-08252011	8/25/2011	260	1439	373,983.0	0.07	0.11	0.0089 AP
104	AIR1-08262011	8/26/2011	245	1443	353,512.9	0.07	0.11	0.1540 AP
105	AIR2-08262011	8/26/2011	244	1449	353,771.3	0.07	0.11	0.0103 AP
106	AIR3-08262011	8/26/2011	260	1439	374,820.3	0.07	0.11	0.0290 AP
107	AIR4-08262011	8/26/2011	N/A	N/A	361,444.1	0.07	0.11	ND
108	AIR1-08272011	8/27/2011	227	1921	435,711.2	0.07	0.11	0.076 AP
109	AIR2-08272011	8/27/2011	231	1941	447,624.4	0.07	0.11	0.0085 AP
110	AIR3-08272011	8/27/2011	245	1912	468,335.9	0.07	0.11	0.0121 AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt

J = Estimated sample result. Result is less then reporting limit

* = Estimated air volume for Blank sample

ND = Not Detected above laboratory reporting limit

AP = Altered Pattern

N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-08272011

GC Semivolatiles

Lot-Sample #...: H1H300409-001 **Work Order #...:** ML44C1AA **Matrix.....:** AA
Date Sampled...: 08/27/11 **Date Received..:** 08/30/11
Prep Date.....: 08/30/11 **Analysis Date..:** 09/01/11
Prep Batch #...: 1242097
Dilution Factor: 5 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.045	ug/m3
Aroclor 1221	ND	0.010	ug/m3
Aroclor 1232	ND G	0.065	ug/m3
Aroclor 1242	**0.056 AP**	**0.010**	**ug/m3**
Aroclor 1248	**0.020 AP**	**0.010**	**ug/m3**
Aroclor 1254	ND	0.010	ug/m3
Aroclor 1260	ND	0.010	ug/m3
Aroclor 1262	ND	0.010	ug/m3
Aroclor 1268	ND	0.010	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	110	(47 - 122)
Decachlorobiphenyl	114 *	(66 - 111)

NOTE(S):

* Surrogate recovery is outside stated control limits.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 26, 2011
Site Weather Conditions Sunny, 59 - 72°F, Predominate wind direction: WSW, Morning high wind 17 mph
General Site Notes 1) 15 minute TWA was not exceeded.
NM = Not Measured

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	19	0.2
Minimum Instantaneous	4	0.0
Maximum Instantaneous	71	0.2
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	25	0.3
Minimum Instantaneous	3	0.0
Maximum Instantaneous	72	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	24	0.3
Minimum Instantaneous	3	0.0
Maximum Instantaneous	65	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	20	0.4
Minimum Instantaneous	2	0.0
Maximum Instantaneous	48	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	13	0.1
Minimum Instantaneous	1	0.0
Maximum Instantaneous	22	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	22	0.3
Minimum Instantaneous	2	0.0
Maximum Instantaneous	47	0.3
AIR-1		
Maximum 15 Minute TWA	23	NM
Minimum Instantaneous	3	NM
Maximum Instantaneous	75	NM
AIR-2		
Maximum 15 Minute TWA	21	NM
Minimum Instantaneous	3	NM
Maximum Instantaneous	34	NM
AIR-3		
Maximum 15 Minute TWA	17	NM
Minimum Instantaneous	3	NM
Maximum Instantaneous	54	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatior Contractor suspends work, identifies source and addresses issue.

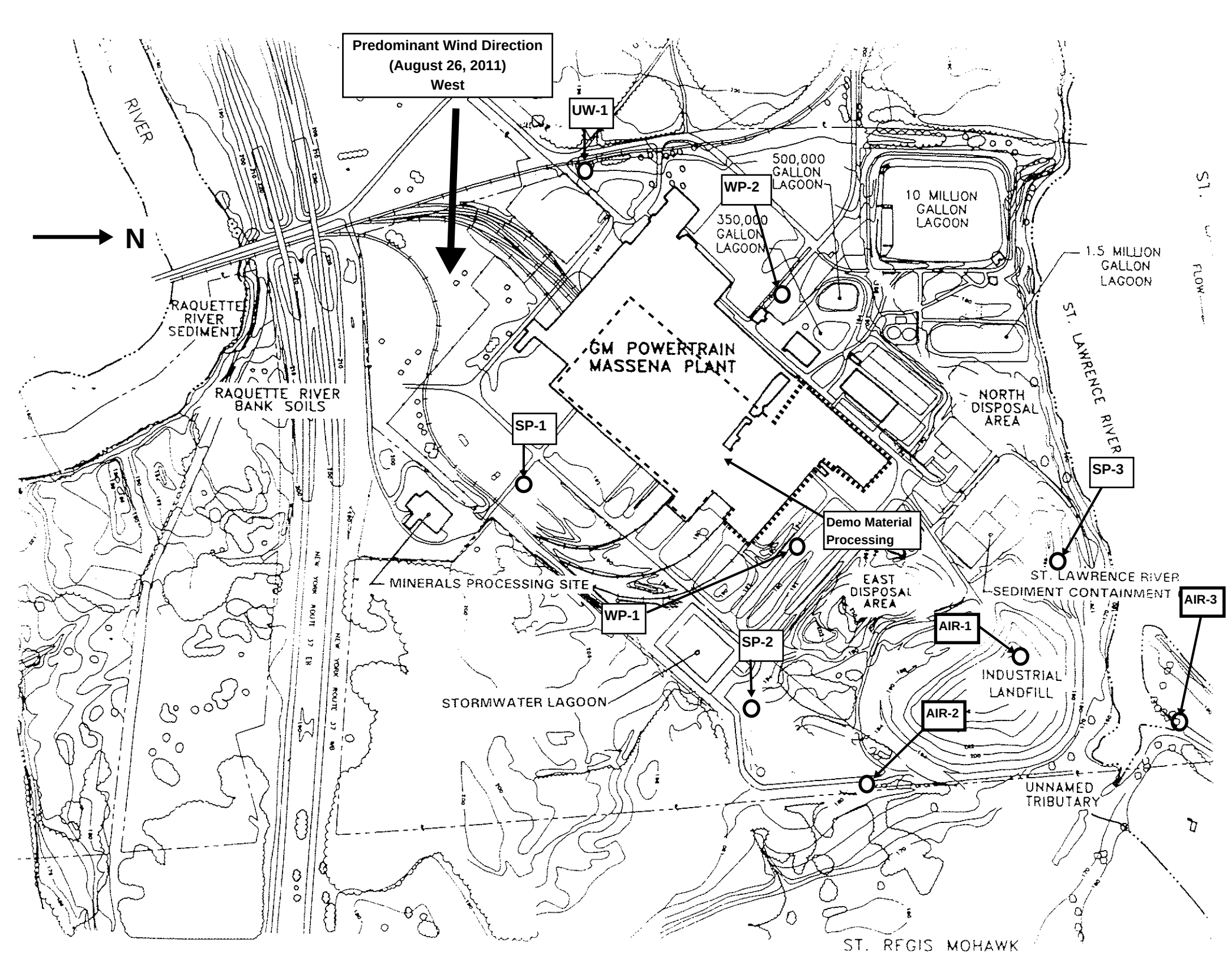
150 µg/m^3 Above background concentrations observed at upwind locatior Contractor stops work, evaluates site activities. Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatior Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatior Contractor stops work, evaluates site activities. Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location. Contractor stops work, implements emission control measures.


Predominant Wind Direction
(August 26, 2011)
West
N
UW-1
WP-2
500,000 GALLON LAGOON
350,000 GALLON LAGOON
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-1
SP-3
Demo Material Processing
MINERALS PROCESSING SITE
WP-1
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
SP-2
INDUSTRIAL LANDFILL
STORMWATER LAGOON
AIR-2
UNNAMED TRIBUTARY
ST. REGIS MOHAWK

Community Air Monitoring Plan - Data Summary

Date of Data Collection August 27, 2011
Site Weather Conditions Sunny, 56 - 79°F, Predominate wind direction: SE, Morning high wind 10 mph
General Site Notes 1) 15 minute TWA was not exceeded.
NM = Not Measured

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	25	0.2
Minimum Instantaneous	12	0.0
Maximum Instantaneous	73	0.2
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	41	0.4
Minimum Instantaneous	14	0.0
Maximum Instantaneous	62	0.5
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	42	0.4
Minimum Instantaneous	15	0.0
Maximum Instantaneous	109	0.4
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	29	0.3
Minimum Instantaneous	12	0.0
Maximum Instantaneous	46	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	20	0.2
Minimum Instantaneous	9	0.0
Maximum Instantaneous	33	0.2
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	18	0.4
Minimum Instantaneous	9	0.0
Maximum Instantaneous	38	0.4
AIR-1		
Maximum 15 Minute TWA	28	NM
Minimum Instantaneous	12	NM
Maximum Instantaneous	35	NM
AIR-2		
Maximum 15 Minute TWA	24	NM
Minimum Instantaneous	14	NM
Maximum Instantaneous	26	NM
AIR-3		
Maximum 15 Minute TWA	24	NM
Minimum Instantaneous	9	NM
Maximum Instantaneous	90	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatior
Contractor suspends work, identifies source and addresses issue.

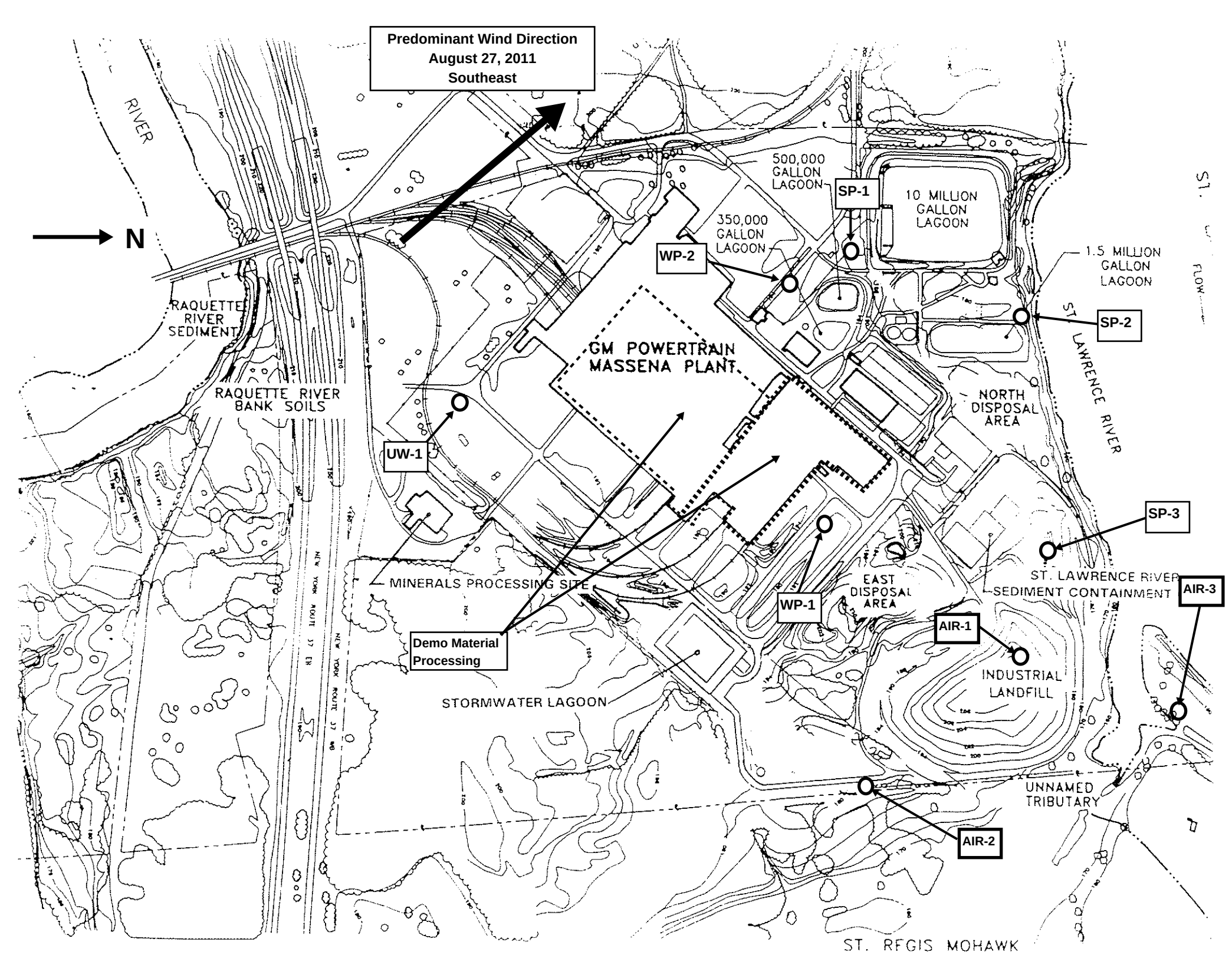
150 µg/m^3 Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatior
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
August 27, 2011
Southeast
N
RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
500,000 GALLON LAGOON
SP-1
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
WP-2
1.5 MILLION GALLON LAGOON
SP-2
ST. LAWRENCE RIVER
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
UW-1
SP-3
MINERALS PROCESSING SITE
WP-1
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08262011-00119 **Date:** August 26, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (35)
Subcontractors: Op Tech (1)
Perras (2)
Heritage (2)

Weather/Wind: Overcast, Partly Cloudy, 59 to 72 degrees F with wind out of the WSW at 1 to 4 mph with gusts up to 17 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Biggest issue to impact the project currently is the possibility of Hurricane Irene storm causing problems on the project site. Flying debris is the primary hazard that the storm presents.
- Dust control at the administration building will be very important because the roofing material contains asbestos. Using the dust boss will minimize dust migration.
- In order to prevent a rise in the emissions from the cell #3 load out new restrictions for this work will be implemented. Any winds of 15 miles per hour sustained for 15 minutes will trigger a shutdown of activity and commencing covering of cell. Implementing software that will notify ARCADIS employees of spikes in wind above 15 mph. Also lowering of the lower alarm notification of particulate concentrations to 50 ug/m3 on the dust track.
- A meeting was held with the team out at Cell #3 to discuss additional measures for preventing additional elevations in particulate levels. In addition the team discussed how the tracking system works.
- The scaffold makes tarping the intermodal containers much easier. It is important that no one is on the scaffold until the truck has entered the scaffold area. If someone was on prior to the truck parking in the scaffolding the potential exist for the truck to hit the scaffold and injure the people on the scaffolding.

Work Activities Summary:

<u>Brandenburg</u>

- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with one hydraulic shear.
- Wrecking low bays in TSCA exclusion zone at column line L/K from 7 to 3 and column line C/D from 3 to 7.
- Started wrecking administration building from the west to the east. The first four bays across contain asbestos containing roofing material. Completed column 19 to 17 across entire administration bldg.
- Torch cutting in designated burn field on the east side of the building footprint in PM.
- Cleaned out the western crusher pit of remaining scrap in AM.
- Shearing P&S iron in lay down area with one shear.
- During the 2nd shift, Brandenburg's mechanic turned blades on two of the shears and hard face welded on both.

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- Disassembly of 984 excavator.
- Sorting metals from C&D piles and separating stainless steel material with grapple.
- Wire stripping activity inside door #42 in the TSCA exclusion zone.
- Loaded seventeen loads of TSCA soil at cell#3
- Loaded seventeen intermodal containers with TSCA debris in reduction zone at column line #29.
- Loaded one railcars with clean bailing material.

Op Tech
- Overseeing asbestos roofing material removal as part of demolition activity.
- Cleaning up and inspecting asbestos exclusion zone.

Heritage
- Rotating intermodal containers to the cell #3 loading area and to column #29 TSCA debris load out area at column #29.
- Obtaining weights for soil and debris that is loaded into intermodal containers.
- Loaded two rail cars with fourteen intermodal containers.
- Manifesting and inspecting loads.

Waste Materials Removed:
Shipped two Heritage rail cars out with 14 intermodal containers to Heritage Landfill in Indiana. Shipped five 100 cu yd trailers with C&D material to Ontario County Landfill. Shipped one 100 cu yd trailer with non friable asbestos and C&D material to Ontario County Landfill.

Samples Collected, Requested/Received Analytical Results:
Samples taken of concrete in the western crusher pit to determine if the pit is suitable for backfilling.

Issues and Concerns:
None

Resolutions to Issues and Concerns:
None

Potential Delays:
None determined at this time.

Supplemental Information:
- See Brandenburg Daily Log (attached) for additional details of site activities.

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-08272011-00120 **Date:** August 27, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1530**

Contractor: Brandenburg (28)
Subcontractors: Op Tech (1)
Perras (2)
Heritage (2)

Weather/Wind: Partly Cloudy, 56 to 79 degrees F with wind out of the SE at 1 to 5 mph with gusts up to 10 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- The entire project must be prepared for the impact of high winds associated with Hurricane Irene. All loose material must be buttoned down and contingency plans in place. This was conveyed to the entire crew
- Attention must be directed toward fixing and maintenance of water management surrounding TSCA exclusion zone.
- Housekeeping is major part of Hurricane Irene preparation.

Work Activities Summary:

Brandenburg

- Continued sizing TSCA building structural steel at column 29 inside TSCA exclusion zone with one hydraulic shear.
- Wrecking low bays in TSCA exclusion zone at column line L/K from 3 to 1 and column line C/D from 7 to11.
- Continued wrecking administration building from the west to the east. The first four bays across contain asbestos containing roofing material. Completed column 15 to 12, JJ through DD.
- Torch cutting in designated burn field on the east side of the building footprint.
- Shearing P&S iron in lay down area with one shear.
- Sorting metals from C&D piles and separating stainless steel material with grapple.
- Wire stripping activity inside door #42 in the TSCA exclusion zone.
- Loaded seventeen loads of TSCA soil at cell#3
- Berm maintenance and general housekeeping.

Op Tech

- Overseeing asbestos roofing material removal as part of demolition activity.
- Cleaning up and inspecting asbestos exclusion zone.

Heritage

- Rotating intermodal containers to the cell #3 loading area. Concentration was made on soil load out due to inclement weather schedule for Monday.

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• Obtaining weights for soil that is loaded into intermodal containers.
Waste Materials Removed: Shipped one 100 cu yd trailers with C&D material to Ontario County Landfill. Shipped two 100 cu yd trailer with non friable asbestos and C&D material to Ontario County Landfill.
Samples Collected, Requested/Received Analytical Results: None
Issues and Concerns: None
Resolutions to Issues and Concerns: None
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Wednesday, September 21, 2011 5:10 PM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino
Cc: Brendan Mullen; 'Craig Arquette'; Casey, Dan; Kemp, Dan; Carrillo-Sheridan, Margaret; David Grant
Subject: Near Exceedance Notification Documentation
Attachments: Near Exceedance Notification 9-12-11.pdf

All,

Please see the attached notice of monitoring results from Air Station #1 located at the top of the ILF for September 12 and 13, 2011. This is a near exceedance above the established evaluation action level of 0.07 ug/m^3 . No other air monitoring locations identified an issue on this date.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

ARCADIS of New York, Inc. | c/o RACER Trust - 56 Chevrolet Road, Route 37 | Massena, NY, 13662
T. 315.764.2299 | M. 315.447.3217 |
www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: 9/21/2011

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Near Exceedance: 9/12/11 and 9/13/11 ***Time of Exceedance/Near Exceedance:*** Two consecutive

24 hour samples both collected from Air Station 1; the first collected from 6:57 am on 9/12/11 to 7:02 am on 9/13/11 a
the second collected from 7:08 am on 9/13/11 to 6:59 am on 9/14/11.

Analytical Result (from 9/12/11): 0.097 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

Analytical Result (from 9/13/11): 0.102 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

The 2 near exceedances are from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a
The sample interval covers work activities from Brandenburg for 2 days (9/12/11) and (9/13/11). On 9/12/11, Brandenburg was torch cutting steel beams to the
concrete floors inside the TSCA area and shearing TSCA impacted structural steel within the exclusion zone with 2 hydraulic shears. On 9/13/11, Brandenburg
loaded PCB-containing soil into 11 intermodal containers. Air monitoring station #1 is approximately 1,200 (+/-) feet from where the torch-cutting occurred and 280
280-feet downwind from where the loading of the PCB-impacted soils occurred. Wind gusts were logged up to 17 mph on 9/12/11 and 29 mph on 9/13/11.
Due to sustained winds above 15 mph on 9/13/11, soil pile loading operations at cell #3 were shut down at 1:30 pm.

Brandenburg Representative Notified: *Mike Massiello and John Williams*
Date: 9/12/2011 and 9/13/11 *Time:* 4:50:00 PM and 4:30 pm

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 9/12/2011 and 9/13/11 *Time:* 3:32:00 PM and 9:10 AM

Immediate Action(s) Required: ____ *Yes* X *No*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedance or near exceedance:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these short term actions will continue. The above actions may have prevented an exceedance on 9/13/11 by shutting down
operations early due to high winds. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedance
to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 9/21/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)
95	AIR1-08232011	8/23/2011	251	1432	359,616.3	0.07	0.11	0.0156 AP
96	AIR2-08232011	8/23/2011	244	1429	348,792.8	0.07	0.11	0.0087 AP
97	AIR3-08232011	8/23/2011	279	1434	399,473.0	0.07	0.11	0.0085 J,AP
98	AIR1-08242011	8/24/2011	247	1431	353,818.3	0.07	0.11	0.0580 AP
99	AIR2-08242011	8/24/2011	247	1428	353,048.9	0.07	0.11	0.0065 J,AP
100	AIR3-08242011	8/24/2011	269	1424	382,915.9	0.07	0.11	0.0183 AP
101	AIR1-08252011	8/25/2011	242	1438	347,935.5	0.07	0.11	0.0135 AP
102	AIR2-08252011	8/25/2011	243	1440	349,307.5	0.07	0.11	0.0027 J,AP
103	AIR3-08252011	8/25/2011	260	1439	373,983.0	0.07	0.11	0.0089 AP
104	AIR1-08262011	8/26/2011	245	1443	353,512.9	0.07	0.11	0.1540 AP
105	AIR2-08262011	8/26/2011	244	1449	353,771.3	0.07	0.11	0.0103 AP
106	AIR3-08262011	8/26/2011	260	1439	374,820.3	0.07	0.11	0.0290 AP
107	AIR4-08262011	8/26/2011	N/A	N/A	361,444.1	0.07	0.11	ND
108	AIR1-08272011	8/27/2011	227	1921	435,711.2	0.07	0.11	0.0760 AP
109	AIR2-08272011	8/27/2011	231	1941	447,624.4	0.07	0.11	0.0085 AP
110	AIR3-08272011	8/27/2011	245	1912	468,335.9	0.07	0.11	0.0121 AP
111	AIR1-08302011	8/30/2011	251	1421	356,160.9	0.07	0.11	0.0460 AP
112	AIR2-08302011	8/30/2011	246	1418	348,577.6	0.07	0.11	0.0133 AP
113	AIR3-08302011	8/30/2011	273	1417	387,409.7	0.07	0.11	0.0092 AP
114	AIR1-08312011	8/31/2011	249	1436	357,028.1	0.07	0.11	0.1550 AP
115	AIR2-08312011	8/31/2011	247	1439	355,917.8	0.07	0.11	0.0187 AP
116	AIR3-08312011	8/31/2011	276	1444	398,963.7	0.07	0.11	0.0205 AP
117	AIR1-09012011	9/1/2011	249	1442	358,757.7	0.07	0.11	0.0032 J,AP
118	AIR2-09012011	9/1/2011	250	1442	360,018.3	0.07	0.11	0.0026 J,AP
119	AIR3-09012011	9/1/2011	272	1424	386,809.6	0.07	0.11	0.0019 J,AP
120	AIR1-09012011B	9/1/2011	245	628	154,118.1	0.07	0.11	ND
121	AIR2-09012011B	9/1/2011	245	606	148,180.2	0.07	0.11	ND
122	AIR3-09012011B	9/1/2011	255	602	153,223.0	0.07	0.11	ND
123	AIR1-09022011	9/2/2011	242	1282	309,818.9	0.07	0.11	0.0268 AP
124	AIR2-09022011	9/2/2011	242	1300	315,044.9	0.07	0.11	0.0110 AP
125	AIR3-09022011	9/2/2011	260	1295	336,216.4	0.07	0.11	0.0105 AP
126	AIR4-09022011	9/2/2011	N/A	N/A	333,295.1	0.07	0.11	ND
127	AIR1-09082011	9/8/2011	251	1439	361,092.2	0.07	0.11	0.0008 J,AP
128	AIR2-09082011	9/8/2011	246	1437	353,513.7	0.07	0.11	0.0006 J,AP
129	AIR3-09082011	9/8/2011	268	1459	390,431.4	0.07	0.11	ND
130	AIR1-09092011	9/9/2011	250	1428	356,892.0	0.07	0.11	0.0171 AP
131	AIR2-09092011	9/9/2011	248	1434	356,310.0	0.07	0.11	0.0048 J,AP
132	AIR3-09092011	9/9/2011	248	1419	351,428.6	0.07	0.11	0.0058 J,AP
133	AIR1-09102011	9/10/2011	245	1962	481,165.2	0.07	0.11	0.0280 AP
134	AIR2-09102011	9/10/2011	243	1999	486,290.1	0.07	0.11	0.0176 AP
135	AIR3-09102011	9/10/2011	253	1947	493,366.9	0.07	0.11	0.0051 J,AP
136	AIR1-09132011	9/13/2011	243	1445	350,742.7	0.07	0.11	0.0970 AP
137	AIR2-09132011	9/13/2011	243	1446	351,759.5	0.07	0.11	0.0130 AP
138	AIR3-09132011	9/13/2011	247	1420	350,413.3	0.07	0.11	0.0440 AP
139	AIR1-09142011	9/14/2011	244	1431	349,493.6	0.07	0.11	0.1020 AP
140	AIR2-09142011	9/14/2011	243	1429	347,944.6	0.07	0.11	0.0146 AP
141	AIR3-09142011	9/14/2011	252	1430	360,654.3	0.07	0.11	0.0350 AP
142	AIR4-09142011	9/14/2011	N/A	N/A	348,394.2	0.07	0.11	ND

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-09132011

GC Semivolatiles

Lot-Sample #...: H1I140407-001 **Work Order #...:** MME4R1AA **Matrix.....:** AA
Date Sampled...: 09/13/11 **Date Received..:** 09/14/11
Prep Date.....: 09/14/11 **Analysis Date..:** 09/15/11
Prep Batch #...: 1257063
Dilution Factor: 14.26 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.051	ug/m3
Aroclor 1221	ND	0.029	ug/m3
Aroclor 1232	ND G	0.12	ug/m3
Aroclor 1242	**0.063 AP**	**0.029**	**ug/m3**
Aroclor 1248	**0.034 AP**	**0.029**	**ug/m3**
Aroclor 1254	ND	0.029	ug/m3
Aroclor 1260	ND	0.029	ug/m3
Aroclor 1262	ND	0.029	ug/m3
Aroclor 1268	ND	0.029	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

ARCADIS U.S. Inc

Client Sample ID: AIR1-09142011

GC Semivolatiles

Lot-Sample #...: H1I150410-001 **Work Order #...:** MMF051AA **Matrix.....:** AA
Date Sampled...: 09/14/11 **Date Received..:** 09/15/11
Prep Date.....: 09/15/11 **Analysis Date..:** 09/19/11
Prep Batch #...: 1258052
Dilution Factor: 14.31 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.052	ug/m3
Aroclor 1221	ND	0.029	ug/m3
Aroclor 1232	ND G	0.12	ug/m3
Aroclor 1242	**0.065 AP**	**0.029**	**ug/m3**
Aroclor 1248	**0.037 AP**	**0.029**	**ug/m3**
Aroclor 1254	ND	0.029	ug/m3
Aroclor 1260	ND	0.029	ug/m3
Aroclor 1262	ND	0.029	ug/m3
Aroclor 1268	ND	0.029	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(47 - 122)
Decachlorobiphenyl	NC,DIL	(66 - 111)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection September 12, 2011
Site Weather Conditions Broken Cloud, 58 - 78°F, Predominate wind direction: SSE, Morning high wind 17 mph
General Site Notes
1) Instantaneous elevated readings at WP-1 and WP-2 resulted from dry demolition pad and equipment traffic
2) Contractor was notified and the conditions were addressed with water.
3) Instantaneous elevated readings at AIR-1 resulted from mowing activities on the landfill.
4) No 15 minute TWA was exceeded.

NM = Not Measured

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	53	0.2
Minimum Instantaneous	36	0.0
Maximum Instantaneous	66	0.2
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	83	0.5
Minimum Instantaneous	36	0.0
Maximum Instantaneous	408	0.2
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	54	0.3
Minimum Instantaneous	36	0.0
Maximum Instantaneous	110	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	52	0.3
Minimum Instantaneous	34	0.0
Maximum Instantaneous	83	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	41	0.0
Minimum Instantaneous	27	0.0
Maximum Instantaneous	48	0.0
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	39	0.1
Minimum Instantaneous	30	0.0
Maximum Instantaneous	55	0.1
AIR-1		
Maximum 15 Minute TWA	76	NM
Minimum Instantaneous	41	NM
Maximum Instantaneous	105	NM
AIR-2		
Maximum 15 Minute TWA	49	NM
Minimum Instantaneous	36	NM
Maximum Instantaneous	55	NM
AIR-3		
Maximum 15 Minute TWA	64	NM
Minimum Instantaneous	34	NM
Maximum Instantaneous	94	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.

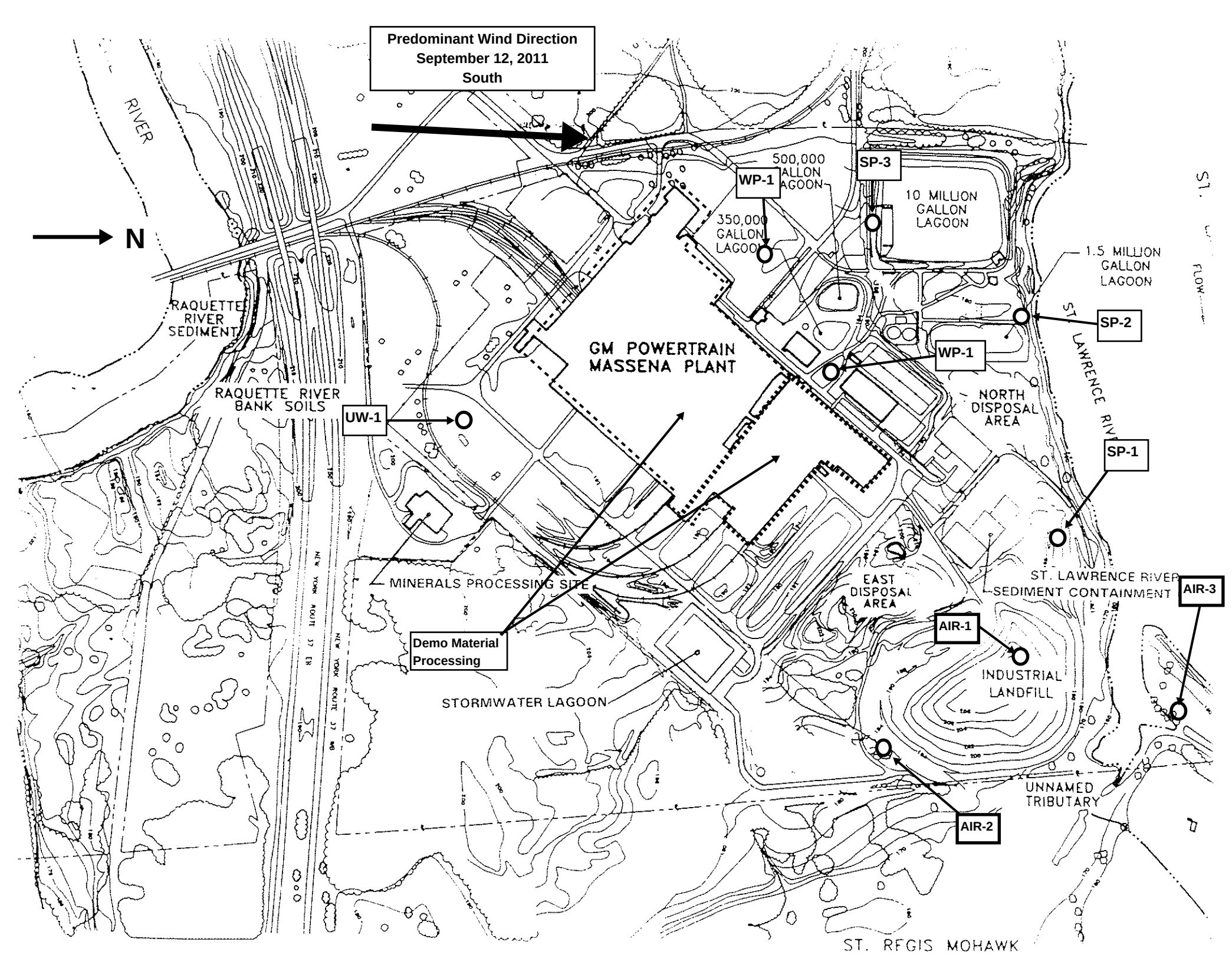
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
September 12, 2011
South
N
RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
UW-1
WP-1
500,000 GALLON LAGOON
350,000 GALLON LAGOON
SP-3
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
SP-2
WP-1
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-1
MINERALS PROCESSING SITE
Demo Material Processing
STORMWATER LAGOON
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
INDUSTRIAL LANDFILL
AIR-2
UNNAMED TRIBUTARY
ST. REGIS MOHAWK
NEW YORK ROUTE 37 ER
NEW YORK ROUTE 37 WB

Community Air Monitoring Plan - Data Summary

Date of Data Collection September 13, 2011

Site Weather Conditions Sunny/Windy, 62 - 81°F, Predominate wind direction: SSE, Afternoon high wind 29 mph
Sustained winds with a 15 minute TWA exceeding 15 mph occurred.
Wind gusts in excess of 29 mph steadily increasing from approximately 9:45 AM till 6:00 PM.

General Site Notes
NM = Not Measured

1) Instantaneous elevated readings at WP-1, WP-2, SP-1 and AIR-1 resulted from dry demolition pad and site perimeter roads along with increased wind speeds.
2) Work activity was suspended until the conditions subsided. The demolition pad and perimeter roads were addressed with water and work activity was resumed.
3) The 15 minute TWA action level was not exceeded. The dust concentrations at WP-1 work station was below the 100 µg/m³ threshold when compared to the corresponding measurement at the Upwind station for the 15 minute TWA.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	54	0.1
Minimum Instantaneous	35	0.0
Maximum Instantaneous	62	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	123	0.2
Minimum Instantaneous	38	0.0
Maximum Instantaneous	341	0.3
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	54	0.3
Minimum Instantaneous	35	0.0
Maximum Instantaneous	153	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	56	0.4
Minimum Instantaneous	34	0.0
Maximum Instantaneous	125	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	53	0.1
Minimum Instantaneous	27	0.0
Maximum Instantaneous	56	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	42	0.4
Minimum Instantaneous	29	0.0
Maximum Instantaneous	46	0.4
AIR-1		
Maximum 15 Minute TWA	62	NM
Minimum Instantaneous	33	NM
Maximum Instantaneous	118	NM
AIR-2		
Maximum 15 Minute TWA	65	NM
Minimum Instantaneous	38	NM
Maximum Instantaneous	89	NM
AIR-3		
Maximum 15 Minute TWA	54	NM
Minimum Instantaneous	33	NM
Maximum Instantaneous	86	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.

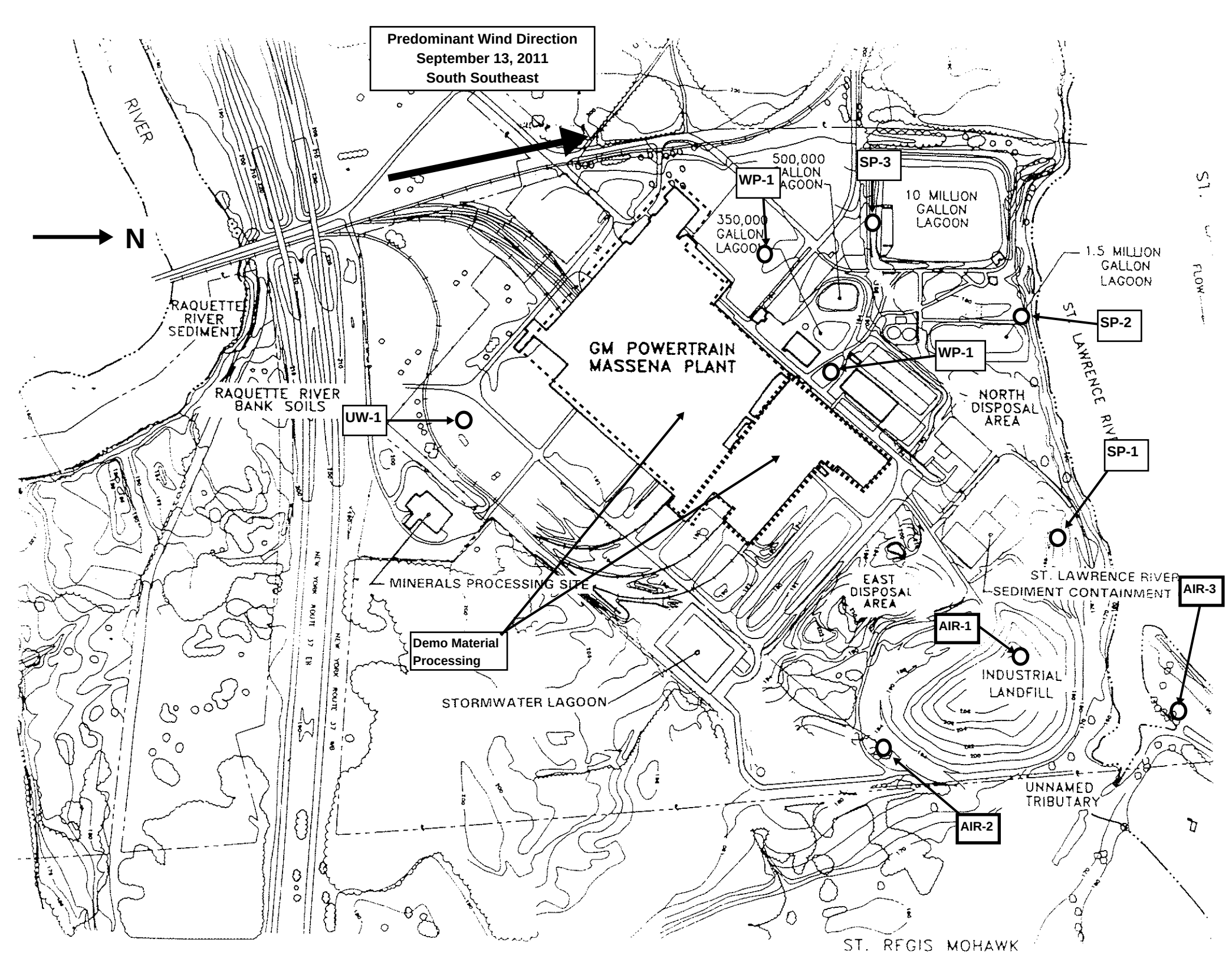
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
September 13, 2011
South Southeast
N
RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
UW-1
WP-1
500,000 GALLON LAGOON
350,000 GALLON LAGOON
SP-3
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
SP-2
WP-1
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-1
MINERALS PROCESSING SITE
Demo Material Processing
STORMWATER LAGOON
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
INDUSTRIAL LANDFILL
AIR-2
UNNAMED TRIBUTARY
ST. REGIS MOHAWK
NEW YORK ROUTE 37 ER
NEW YORK ROUTE 37 WB

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-09122011-00130 **Date:** September 12, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (31)
Subcontractors: Op Tech (3)
Heritage (2)
Perras (0)

Weather/Wind: Mostly Sunny, 59 to 78 degrees F, with winds out of the SSE from 6 to 8 mph with gusts up to 17 mph. .01 inches of rain

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- As part of the housekeeping on the project, wet sweeping of large areas is important. Material generated from the sweeping is being deposited at the high bay TSCA storage area.
- Berms need to be repaired and maintained as part of the water management program. The berms also are used as visual aides to prevent employees from migrating between TSCA exclusion zone and Non TSCA areas.
- Equipment operators must inspect their equipment on a daily basis including proper documentation.

Work Activities Summary:

Brandenburg

- Continued sizing TSCA building structural steel inside TSCA exclusion zone with two hydraulic shears.
- Loaded four 100 cu yd trailers C&D generated from the Admin Bldg.
- On site trucking of clean hard fill from interior wall adjacent to compressor room and electrical switch room and clean scrap to lay down area.
- Repairing, maintaining and installing new berm on the north end of building footprint.
- Torch cutting in designated burn field on the east side of the building footprint.
- Shearing #1 iron in lay down area with one shear.
- Torch cutting beam down to concrete floor inside TSCA exclusion zone.
- Running pre treatment water system from small and large die cast tunnels. (Day #1)
- Loaded 1 trailer with aluminum scrap.
- Loaded 1 trailer with junk electric
- Loaded 1 trailer with 316 stainless scrap.

Op Tech

- Overseeing asbestos roofing material removal as part of demolition activity.
- Overseeing clean up and inspecting asbestos exclusion zone.
- Loaded lab pack material out of 90 day storage for CWM.

Heritage

- Loaded one rail car with seven intermodal containers.

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• Manifest loads, line boxes, and install placards.
Waste Materials Removed: Shipped two Heritage rail cars out with 14 intermodal containers to Heritage Landfill in Indiana. Shipped four 100 cu yd trailers with C&D material to Ontario County Landfill. One trailer load of Aluminum shipped to United Metals. One trailer load of 316 stainless steel to United Metals. One trailer load of misc electric to United Metals. One load of batteries to Metallico in Syracuse NY. One load of Lab Pack shipped to CWM.
Samples Collected, Requested/Received Analytical Results: None.
Issues and Concerns: None
Resolutions to Issues and Concerns: None
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-09132011-00131 **Date:** September 13, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (33)
Subcontractors: Op Tech (1)
Heritage (2)
Perras (2)

Weather/Wind: Windy / Cloudy / Rain Heavy from 1:30 to 2:30 pm. 62 to 81 degrees F. Wind out of the SE at 6 to 15 mph with gusts up to 29 mph. Rain _____ inches

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- The high winds are creating dust problems. The dust fines on the floor are blowing and migrating across the project site. Sufficient watering of the concrete slab is needed to prevent dust from being created.
- Activity at Cell #3 was scrutinized until the shut down at 1:30.

Work Activities Summary:

Brandenburg

- Continued sizing TSCA building structural steel inside TSCA exclusion zone with two hydraulic shears.
- Loaded three 100 cu yd trailers C&D generated from the Admin Bldg.
- Loaded two BISCO trailers with bailing material
- On site trucking of clean hard fill from administration building and interior wall adjacent to compressor room and electrical switch room.
- Repairing, maintaining and installing new berm on the north end of building footprint.
- Torch cutting in designated burn field on the east side of the building footprint.
- Shearing #1 iron in lay down area with one shear.
- Torch cutting beam down to concrete floor.
- Cleaning and housekeeping activity along north side of main building.
- Repairing radiator on 924 excavator used to load TSCA debris.
- Repaired leaking hydraulic hose on 924 excavator.
- Loaded 10 intermodal containers with TSCA debris at door#18.
- Loaded 11 intermodal containers with soil from cell#3 until 1:30 pm.
- Loaded 1 trailer with aluminum scrap.

Op Tech

- Overseeing asbestos roofing material removal as part of demolition activity.
- Overseeing clean up and inspecting asbestos exclusion zone.

Heritage

- Rotating intermodal containers on site from track #7 to cell #3 and TSCA debris load out at door #18.

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• Obtain weights for soil and TSCA debris. • Manifest loads, line boxes, and install placards.
Waste Materials Removed: Shipped two Heritage rail cars out with 14 intermodal containers to Heritage Landfill in Indiana. Shipped three 100 cu yd trailers with C&D material to Ontario County Landfill. Shipped two trailer loads of bailing material to Ben Wiesmans Yard in Owego, NY. One trailer load of Aluminum shipped to United Metals.
Samples Collected, Requested/Received Analytical Results: None.
Issues and Concerns: Wind condition caused shut down of activity at Cell#3 at 1:30 pm. Activity on the demolition floor was suspended from 1:30 to 2:15.
Resolutions to Issues and Concerns: Activity resumed on demolition floor following a rain storm and reduction in wind.
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Wednesday, September 28, 2011 10:09 AM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino
Cc: Casey, Dan; Brendan Mullen; 'Craig Arquette'; Kemp, Dan; Carrillo-Sheridan, Margaret; David Grant
Subject: Near Exceedance Notification Documentation
Attachments: Near Exceedance-Notification 9-20-11.pdf

All,

Please see the attached notice of monitoring results from Air Station #1 located at the top of the ILF for September 20, 2011. This is a near exceedance above the established evaluation action level of 0.07 ug/m^3 . No other air monitoring locations identified an issue on this date. The short term actions established will continue and were reviewed with John Williams, with Brandenburg this morning.

If you have any questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

ARCADIS of New York, Inc. | c/o RACER Trust - 56 Chevrolet Road, Route 37 | Massena, NY, 13662
T. 315.764.2299 | M. 315.447.3217 |
www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: 9/27/2011

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 9/20/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:05 am on 9/20/11 to 6:58 am on 9/21/11 from Air Station #1.

Analytical Result (or measurement): 0.0840 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers work activities from Brandenburg for 1 day (9/20/11) and the evening of of 9/20/11. Brandenburg loaded PCB-containing soil into 14 intermodal containers on 8/30/11. Air monitoring station #1 is approximately 280-feet away and downwind from where the loading occurred. Wind gusts were out of the south and southwest and logged up to 17 mph during the sampling interval period.

Brandenburg Representative Notified: *John Williams*
Date: 9/28/2011 *Time:* 9:35 AM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 9/27/2011 *Time:* 8:55 AM

Immediate Action(s) Required: ____ *Yes* **X** *No* *Continue with existing established actions.*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedances or near exceedances:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these short term actions will continue. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedances to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 9/28/2011 *Confirmed by:* *Richard Boelter*

Discussed near exceedance in detail with John Williams and re-enforced Short Term Actions to follow to end of project.

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
136	AIR1-09132011	9/13/2011	243	1445	350,742.7	0.07	0.11	0.0970 AP
137	AIR2-09132011	9/13/2011	243	1446	351,759.5	0.07	0.11	0.0130 AP
138	AIR3-09132011	9/13/2011	247	1420	350,413.3	0.07	0.11	0.0440 AP
139	AIR1-09142011	9/14/2011	244	1431	349,493.6	0.07	0.11	0.1020 AP
140	AIR2-09142011	9/14/2011	243	1429	347,944.6	0.07	0.11	0.0146 AP
141	AIR3-09142011	9/14/2011	252	1430	360,654.3	0.07	0.11	0.0350 AP
142	AIR4-09142011	9/14/2011	N/A	N/A	348,394.2	0.07	0.11	ND
143	AIR1-09152011	9/15/2011	249	1444	359,567.6	0.07	0.11	0.0390 AP
144	AIR2-09152011	9/15/2011	249	1439	357,975.2	0.07	0.11	0.0162 AP
145	AIR3-09152011	9/15/2011	253	1443	365,745.4	0.07	0.11	0.0132 AP
146	AIR1-09162011	9/16/2011	255	1431	364,349.9	0.07	0.11	0.0380 AP
147	AIR2-09162011	9/16/2011	254	1433	363,532.0	0.07	0.11	0.0183 AP
148	AIR3-09162011	9/16/2011	262	1454	380,641.4	0.07	0.11	0.0065 J,AP
149	AIR1-09172011	9/17/2011	256	1944	497,995.1	0.07	0.11	0.0144 AP
150	AIR2-09172011	9/17/2011	254	1940	492,644.7	0.07	0.11	0.0081 AP
151	AIR3-09172011	9/17/2011	257	1878	481,983.7	0.07	0.11	0.0178 AP
152	AIR1-09202011	9/20/2011	248	1438	356,490.3	0.07	0.11	0.0141 AP
153	AIR2-09202011	9/20/2011	248	1440	356,895.0	0.07	0.11	0.0027 J,AP
154	AIR3-09202011	9/20/2011	257	1434	368,756.9	0.07	0.11	0.0080 AP
155	AIR1-09212011	9/21/2011	253	1433	362,840.7	0.07	0.11	0.0840 AP
156	AIR2-09212011	9/21/2011	250	1436	359,368.1	0.07	0.11	0.0231 AP
157	AIR3-09212011	9/21/2011	256	1420	363,579.5	0.07	0.11	0.0159 AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-09212011

GC Semivolatiles

Lot-Sample #...: H1I220403-001 **Work Order #...:** MMMK81AA **Matrix.....:** AA
Date Sampled...: 09/21/11 **Date Received..:** 09/22/11
Prep Date.....: 09/22/11 **Analysis Date..:** 09/26/11
Prep Batch #...: 1265063
Dilution Factor: 6.89 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.047	ug/m3
Aroclor 1221	ND	0.014	ug/m3
Aroclor 1232	ND G	0.071	ug/m3
Aroclor 1242	**0.059 AP**	**0.014**	**ug/m3**
Aroclor 1248	**0.025 AP**	**0.014**	**ug/m3**
Aroclor 1254	ND	0.014	ug/m3
Aroclor 1260	ND	0.014	ug/m3
Aroclor 1262	ND	0.014	ug/m3
Aroclor 1268	ND	0.014	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	120	(47 - 122)
Decachlorobiphenyl	111	(66 - 111)

NOTE(S):

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection September 20, 2011
Site Weather Conditions Sunny, 55 - 70°F, Predominate wind direction: S, Afternoon high wind 17 mph
General Site Notes 1) Instantaneous elevated reading at UW-1 resulted from dry and dusty site perimeter roads.
NM = Not Measured 2) Conditions were addressed with water. No 15 minute TWA was exceeded.

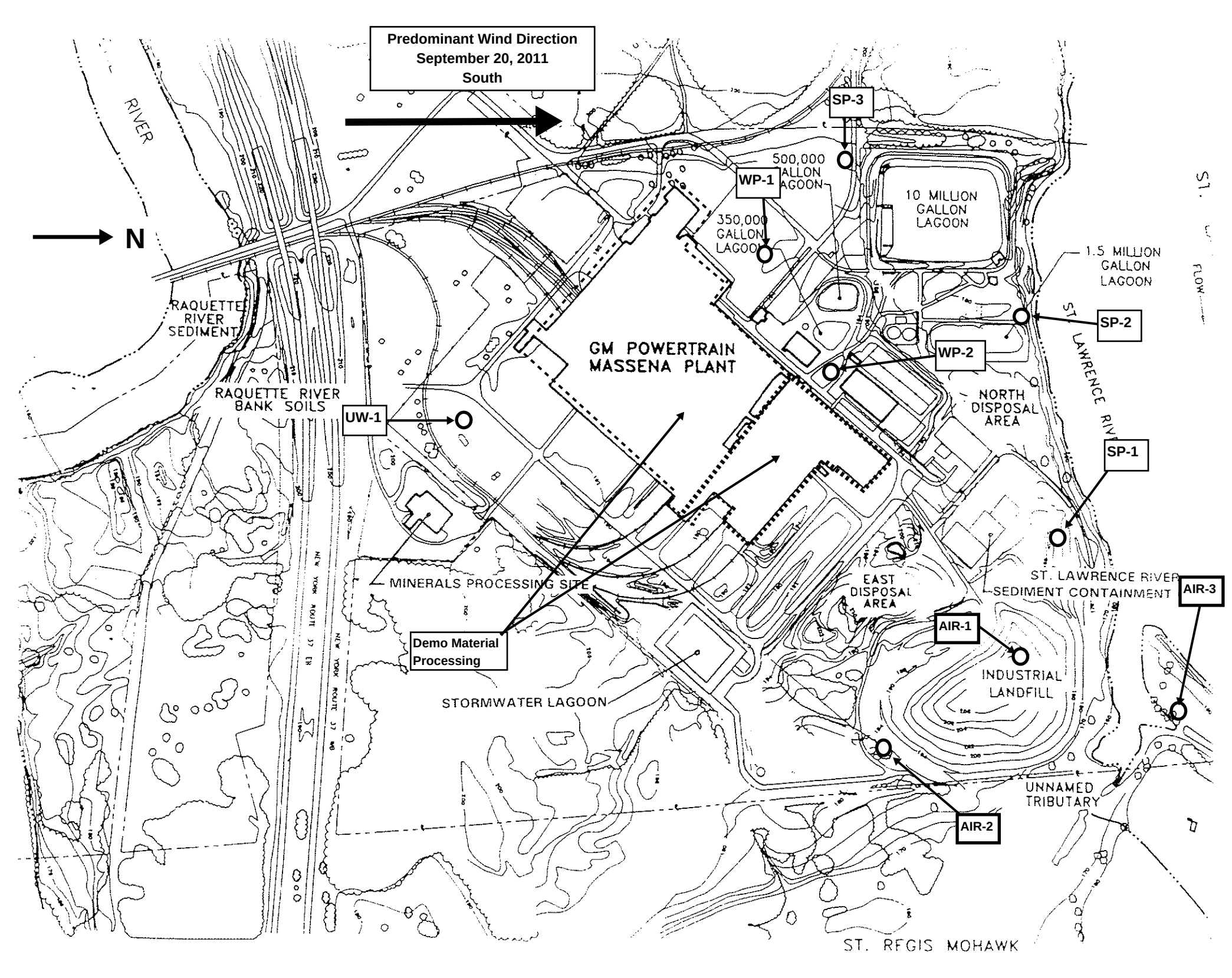
CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	31	0.1
Minimum Instantaneous	7	0.0
Maximum Instantaneous	140	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	16	0.3
Minimum Instantaneous	6	0.0
Maximum Instantaneous	64	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	14	0.4
Minimum Instantaneous	6	0.0
Maximum Instantaneous	41	0.4
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	13	0.4
Minimum Instantaneous	4	0.0
Maximum Instantaneous	17	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	11	0.1
Minimum Instantaneous	2	0.0
Maximum Instantaneous	15	0.2
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	11	0.5
Minimum Instantaneous	5	0.0
Maximum Instantaneous	14	0.5
AIR-1		
Maximum 15 Minute TWA	16	NM
Minimum Instantaneous	5	NM
Maximum Instantaneous	30	NM
AIR-2		
Maximum 15 Minute TWA	18	NM
Minimum Instantaneous	8	NM
Maximum Instantaneous	20	NM
AIR-3		
Maximum 15 Minute TWA	19	NM
Minimum Instantaneous	4	NM
Maximum Instantaneous	83	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.
>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.
>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
September 20, 2011
South
N
SP-3
WP-1
500,000 GALLON LAGOON
350,000 GALLON LAGOON
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
SP-2
WP-2
GM POWERTRAIN MASSENA PLANT
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
UW-1
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-1
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK
NEW YORK ROUTE 37 ER
NEW YORK ROUTE 37 WB
RIVER
FLOW

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-09202011-00137 **Date:** September 20, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (27)
Subcontractors: Heritage (3)
Perras (1)

Weather/Wind: Overcast 55 to 70° F \ Wind out of the SW at 4 to 9 miles per hour. Wind gusts to 17 mph. No precipitation

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Employees are leaving equipment running through lunch. No equipment on site should be left idleing for more than five minutes.
- Attention is focused on housekeeping and cleaning of the floors. Removal of dust on the pad will reduce the need for dust control watering.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with one hydraulic shear.
- Loaded four 100 cu yd trailers C&D. Loaded four rail cars with clean #1 scrap.
- Plugging sanitary sewer lines at the interior guard shack.
- Torch cutting in designated burn field on the east side of the building footprint.
- Cleaning pad of dust and housekeeping activity inside and outside of the TSCA exclusion zone.
- Running pre-treat water system from the small die cast.
- Loaded 14 intermodal containers with TSCA debris at door#16.
- Loaded 14 intermodal containers with soil from Cell #3.
- Loaded two trailers with non ferrous metals.

Heritage

- Flat tire on forklift and one yard truck with blown up engine is hampering effort.
- Rotating intermodal containers to Cell #3 for soil loading. Transporting containers to door #16 for loading of demolition debris. Each load is weighed to calculate soil and debris weights.
- Loaded 2 rail cars with 14 intermodal containers. Manifested by Heritage and inspected by ARCADIS.

Perras

- Driving and tarping loads of Cell #3 soil and debris under the direction of Heritage

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Waste Materials Removed: Shipped two Heritage rail cars out with 14 intermodal containers to Heritage Landfill in Indiana. Shipped four 100 cu yd trailers with C&D material to Ontario County Landfill. Shipped four loads of #1 clean scrap to Ameriasteel. Shipped one load of Aluminum sheet and block to United. Shipped on load of junk electric to United.
Samples Collected, Requested/Received Analytical Results: None.
Issues and Concerns: None.
Resolutions to Issues and Concerns: None
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Penniman, Dawn

From: Boelter, Richard
Sent: Wednesday, October 05, 2011 9:06 AM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino
Cc: Casey, Dan; Brendan Mullen; Kemp, Dan; Carrillo-Sheridan, Margaret; David Grant
Subject: Near Exceedance Notification Documentation
Attachments: Near Exceedance-Notification 9-22-11.pdf

Anne,

Attached please find the notice of monitoring results from Air Station #1 located at the top of the ILF for September 22, 2011. The analytical result was 0.0830 ug/m^3 , which is slightly above the evaluation action level of 0.07 ug/m^3 . The short term actions established from previous events will continue. All results received since that day have been below the evaluation action level.

If you have any further questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

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T. 315.764.2299 | M. 315.447.3217 |
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RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **10/3/2011**

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 9/22/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:38 am on 9/22/11 to 8:05 am on 9/23/11 from Air Station #1.

Analytical Result (or measurement): 0.0830 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This near exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers Brandenburg work activities for 1 day from 9/22/11 to the morning of 9/23/11. Brandenburg loaded PCB-containing soil into 12 intermodal containers on 9/22/11. Air monitoring station #1 is approximately 280-feet away and downwind from where the loading occurred. Wind gusts were out of the south and southwest and logged up to 15 mph during the sampling interval period.

Brandenburg Representative Notified: *John Williams*
Date: 10/1/2011 *Time:* 2:35 AM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*
Date: 9/27/2011 *Time:* 4:35 PM

Immediate Action(s) Required: ____ *Yes* **X** *No* *Continue with existing established actions.*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedances or near exceedances and will be continu

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these corrective actions will continue. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedances to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 10/3/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)
136	AIR1-09132011	9/13/2011	243	1445	350,742.7	0.07	0.11	0.0970 AP
137	AIR2-09132011	9/13/2011	243	1446	351,759.5	0.07	0.11	0.0130 AP
138	AIR3-09132011	9/13/2011	247	1420	350,413.3	0.07	0.11	0.0440 AP
139	AIR1-09142011	9/14/2011	244	1431	349,493.6	0.07	0.11	0.1020 AP
140	AIR2-09142011	9/14/2011	243	1429	347,944.6	0.07	0.11	0.0146 AP
141	AIR3-09142011	9/14/2011	252	1430	360,654.3	0.07	0.11	0.0350 AP
142	AIR4-09142011	9/14/2011	N/A	N/A	348,394.2	0.07	0.11	ND
143	AIR1-09152011	9/15/2011	249	1444	359,567.6	0.07	0.11	0.0390 AP
144	AIR2-09152011	9/15/2011	249	1439	357,975.2	0.07	0.11	0.0162 AP
145	AIR3-09152011	9/15/2011	253	1443	365,745.4	0.07	0.11	0.0132 AP
146	AIR1-09162011	9/16/2011	255	1431	364,349.9	0.07	0.11	0.0380 AP
147	AIR2-09162011	9/16/2011	254	1433	363,532.0	0.07	0.11	0.0183 AP
148	AIR3-09162011	9/16/2011	262	1454	380,641.4	0.07	0.11	0.0065 J,AP
149	AIR1-09172011	9/17/2011	256	1944	497,995.1	0.07	0.11	0.0144 AP
150	AIR2-09172011	9/17/2011	254	1940	492,644.7	0.07	0.11	0.0081 AP
151	AIR3-09172011	9/17/2011	257	1878	481,983.7	0.07	0.11	0.0178 AP
152	AIR1-09202011	9/20/2011	248	1438	356,490.3	0.07	0.11	0.0141 AP
153	AIR2-09202011	9/20/2011	248	1440	356,895.0	0.07	0.11	0.0027 J,AP
154	AIR3-09202011	9/20/2011	257	1434	368,756.9	0.07	0.11	0.0080 AP
155	AIR1-09212011	9/21/2011	253	1433	362,840.7	0.07	0.11	0.0840 AP
156	AIR2-09212011	9/21/2011	250	1436	359,368.1	0.07	0.11	0.0231 AP
157	AIR3-09212011	9/21/2011	256	1420	363,579.5	0.07	0.11	0.0159 AP
158	AIR1-09222011	9/22/2011	247	1467	361,955.1	0.07	0.11	0.0055 J,AP
159	AIR2-09222011	9/22/2011	246	1460	358,689.5	0.07	0.11	0.0040 J,AP
160	AIR3-09222011	9/22/2011	247	1454	359,239.9	0.07	0.11	0.0036 J,AP
161	AIR1-09232011	9/23/2011	227	1467	332,931.0	0.07	0.11	0.0830 AP
162	AIR2-09232011	9/23/2011	227	1435	325,953.9	0.07	0.11	0.0156 AP
163	AIR3-09232011	9/23/2011	240	1492	358,486.9	0.07	0.11	0.0370 AP
164	AIR4-09232011	9/23/2011	N/A	N/A	357,246.8	0.07	0.11	ND
165	AIR1-09242011	9/24/2011	232	1886	437,185.8	0.07	0.11	0.0055 AP
166	AIR2-09242011	9/24/2011	228	1895	431,768.9	0.07	0.11	0.0029 J,AP
167	AIR3-09242011	9/24/2011	245	1835	450,348.0	0.07	0.11	0.0024 J,AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-09232011

GC Semivolatiles

Lot-Sample #...: H1I240401-001 **Work Order #...:** MMPCL1AA **Matrix.....:** AA
Date Sampled...: 09/23/11 **Date Received..:** 09/24/11
Prep Date.....: 09/26/11 **Analysis Date..:** 09/27/11
Prep Batch #...: 1269033
Dilution Factor: 7.51 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.046	ug/m3
Aroclor 1221	ND	0.015	ug/m3
Aroclor 1232	ND G	0.074	ug/m3
Aroclor 1242	**0.057 AP**	**0.015**	**ug/m3**
Aroclor 1248	**0.026 AP**	**0.015**	**ug/m3**
Aroclor 1254	ND	0.015	ug/m3
Aroclor 1260	ND	0.015	ug/m3
Aroclor 1262	ND	0.015	ug/m3
Aroclor 1268	ND	0.015	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	107	(47 - 122)
Decachlorobiphenyl	132 *	(66 - 111)

NOTE(S):

* Surrogate recovery is outside stated control limits.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection September 22, 2011
Site Weather Conditions Sunny, 63 - 74°F, Predominate wind direction: S, Evening high wind 15 mph
General Site Notes 1) Instantaneous elevated reading at SP-2 resulted from dry site perimeter roads and increased vehicle traffic.
NM = Not Measured 2) No 15 minute time weighted average was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	46	0.1
Minimum Instantaneous	20	0.0
Maximum Instantaneous	57	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	48	0.4
Minimum Instantaneous	21	0.0
Maximum Instantaneous	90	0.5
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	49	0.3
Minimum Instantaneous	19	0.0
Maximum Instantaneous	79	0.4
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	44	0.4
Minimum Instantaneous	20	0.0
Maximum Instantaneous	59	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	46	0.1
Minimum Instantaneous	17	0.0
Maximum Instantaneous	143	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	36	0.3
Minimum Instantaneous	17	0.0
Maximum Instantaneous	40	0.3
AIR-1		
Maximum 15 Minute TWA	51	NM
Minimum Instantaneous	19	NM
Maximum Instantaneous	69	NM
AIR-2		
Maximum 15 Minute TWA	43	NM
Minimum Instantaneous	20	NM
Maximum Instantaneous	47	NM
AIR-3		
Maximum 15 Minute TWA	44	NM
Minimum Instantaneous	21	NM
Maximum Instantaneous	64	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.

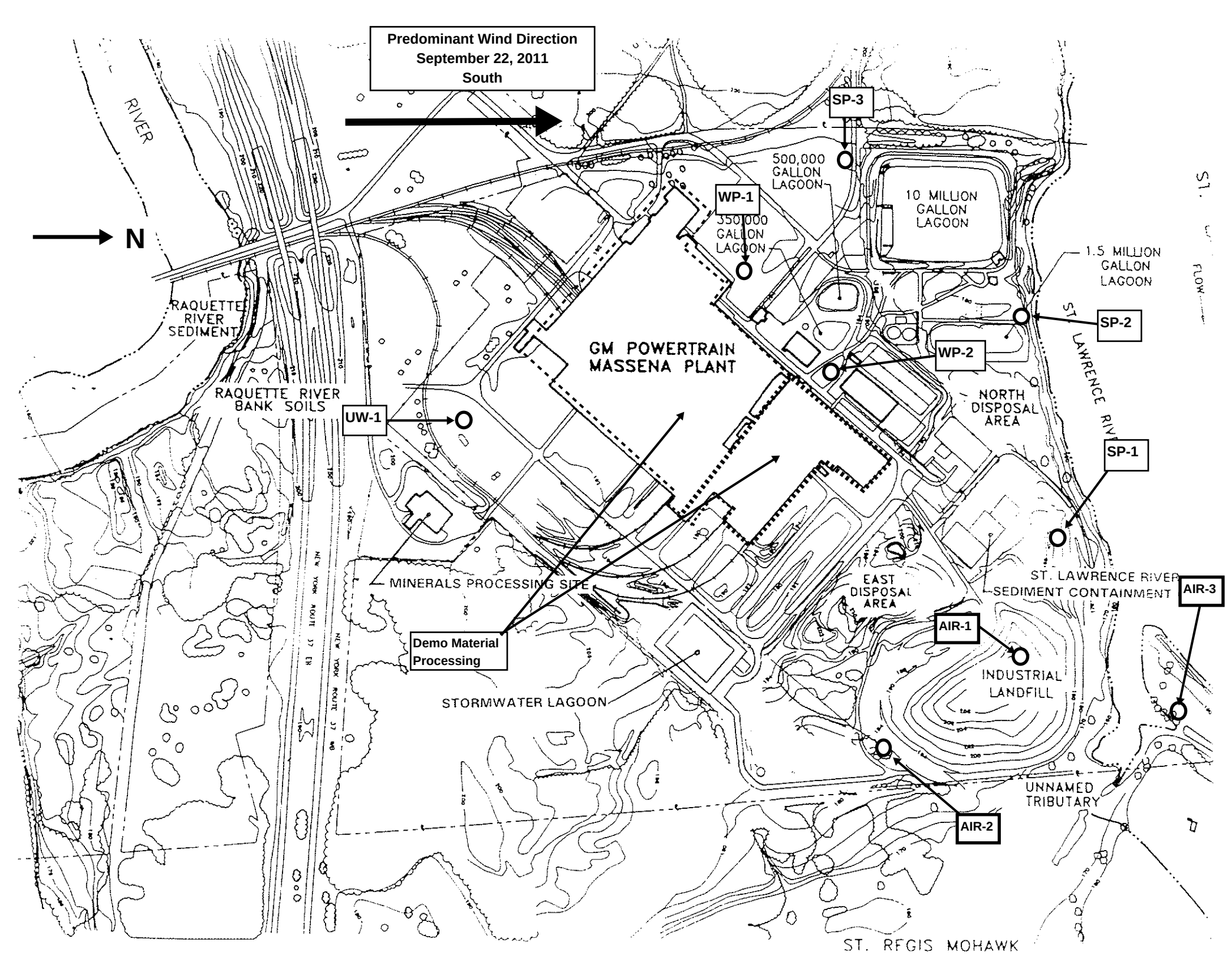
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
September 22, 2011
South
N
SP-3
500,000 GALLON LAGOON
WP-1
350,000 GALLON LAGOON
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
SP-2
WP-2
GM POWERTRAIN MASSENA PLANT
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
UW-1
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-1
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK
NEW YORK ROUTE 37 ER
NEW YORK ROUTE 37 WB
RIVER
FLOW

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-09222011-00139 **Date:** September 22, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (4)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (27)
Subcontractors: Heritage (3)
Perras (1)

Weather/Wind: Overcast Drizzle AM / 63 to 75 ° F \ Wind out of the South at 1 to 5 mph with wind gusts to 15 mph.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Employees entering the exclusion zone at Cell #3 must maintain the sign in log.
- In an effort to reduce our carbon foot print, operators should not idle equipment for longer than five minutes.
- A depressed area on the concrete floor was observed by the large die cast tunnels. The area has been coned off to prevent any equipment operator from running equipment into this area.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with two hydraulic shears.
- Loaded three 100 cu yd trailers C&D. Loaded five rail cars with clean scrap.
- Cleaning out chiller building pits of water, silt and any associated piping.
- Torch cutting in designated burn field on the east side of the building footprint.
- Created new designated burning field east of door #42 on concrete floor slab. Work is mostly cleaning non ferrous metals.
- Cleaning pad of dust and housekeeping activity inside and outside of the TSCA exclusion zone.
- Installed float system on pre-treat water system so the system can run continuously through the night.
- Loaded 11 intermodal containers with TSCA debris at door#16.
- Loaded 12 intermodal containers with soil from Cell #3.
- .

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Transporting containers to door #18 for loading of demolition debris. Each load is weighed to calculate soil and debris weights.
- Loaded 2 rail cars with 14 intermodal containers. Manifested by Heritage and inspected by ARCADIS.

Perras

- Driving and tarping loads of Cell #3 soil and TSCA debris under the direction of Heritage.

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Waste Materials Removed: Shipped two Heritage rail cars out with 14 intermodal containers to Heritage Landfill in Indiana. Shipped three 100 cu yd trailers with C&D material to Ontario County Landfill. Five rail cars with clean scrap were shipped off site.
Samples Collected, Requested/Received Analytical Results: None.
Issues and Concerns: Energized electrical line found by employees at Cell #3,
Resolutions to Issues and Concerns: Line was de-energized and an investigation is being conducted.
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Tel (315) 446-9120 • Fax (315) 446-5807 • www.arcadis.com • offices nationwide

Penniman, Dawn

From: Boelter, Richard
Sent: Wednesday, October 12, 2011 8:51 AM
To: 'Kelly.Anne@epamail.epa.gov'; Zack, Dino
Cc: Casey, Dan; Brendan Mullen; Kemp, Dan; Carrillo-Sheridan, Margaret; David Grant
Subject: Near Exceedance Notification Documentation
Attachments: N Exceedance_0930-10-1-11.pdf

Anne,

Attached please find a notice of monitoring results from Air Station #1 located at the top of the ILF. The analytical result was 0.0980 ug/m^3, which is slightly above the evaluation action level of 0.07 ug/m^3 . The short term actions established from previous events will continue. All results received since that day have been below the evaluation action level.

If you have any further questions, please let me know.

Richard G. Boelter | **Certified Project Manager** | richard.boelter@arcadis-us.com

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www.arcadis-us.com

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **10/11/2011**

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 9/30/2011 thru 10/1/11 ***Time of Exceedance/Near Exceedance:*** 31.5 hour sample, collected from 7:22 am on 9/30/11 to 14:46 am on 10/1/11 from Air Station #1.

Analytical Result (or measurement): 0.0980 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This near exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers Brandenburg work activities for 2 day from 9/30/11 to the end of the day on 10/1/11. At cell #3, Brandenburg loaded PCB-containing soil into 15 intermodal containers on 9/30/11 and 14 intermodal boxes on 10/1/11. Air monitoring station #1 is downwind and approximately 280-feet away from where the loading in cell #3 occurred. On 9/30/11, the wind was predominantly out of the south with average wind speeds around 10-12 mph with gusts as high as 25 mph. On 10/1/11, the wind was mostly out of the north with average wind speeds around 2-9 mph with gusts as high as 18 mph.

Brandenburg Representative Notified: *John Williams*

Date: 10/10/2011 *Time:* 3:55 AM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*

Date: 10/7/2011 *Time:* 4:25 PM

Immediate Action(s) Required: ____ *Yes* **X** *No* *Continue with existing established actions.*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedances or near exceedances and will be continued:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Identify for field personnel specific parameters for the definition of a sustained gust of wind, and
5). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
6). Obtaining software upgrade for the weather station to notify via email in the event of high wind gusts.
7). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of NIOSH 5503 for PCBs at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant (begun on 9/1/11).
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these corrective actions will continue. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedances to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 10/11/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m³)		Analytical Result Total PCBs (ug/m³)
165	AIR1-09242011	9/24/2011	232	1886	437,185.8	0.07	0.11	0.0055 AP
166	AIR2-09242011	9/24/2011	228	1895	431,768.9	0.07	0.11	0.0029 J,AP
167	AIR3-09242011	9/24/2011	245	1835	450,348.0	0.07	0.11	0.0024 J,AP
168	AIR1-09272011	9/27/2011	218	1369	298,050.5	0.07	0.11	0.0209 AP
169	AIR2-09272011	9/27/2011	213	1347	287,217.7	0.07	0.11	0.0109 AP
170	AIR3-09272011	9/27/2011	250	1343	335,544.5	0.07	0.11	0.0050 J,AP
171	AIR1-09282011	9/28/2011	223	1451	323,291.3	0.07	0.11	0.0023 J,AP
172	AIR2-09282011	9/28/2011	222	1408	313,174.0	0.07	0.11	ND
173	AIR3-09282011	9/28/2011	219	1443	316,471.3	0.07	0.11	0.0017 J,AP
174	AIR1-09292011	9/29/2011	222	1409	312,102.7	0.07	0.11	0.0021 J,AP
175	AIR2-09292011	9/29/2011	219	1428	312,040.5	0.07	0.11	0.0028 J,AP
176	AIR3-09292011	9/29/2011	213	1426	303,738.8	0.07	0.11	0.0027 J,AP
177	AIR1-09302011	9/30/2011	221	1421	314,463.6	0.07	0.11	0.0209 AP
178	AIR2-09302011	9/30/2011	221	1430	315,877.3	0.07	0.11	0.0069 J,AP
179	AIR3-09302011	9/30/2011	218	1456	317,254.9	0.07	0.11	0.0146 AP
180	AIR1-10012011	10/1/2011	209	1884	394,114.6	0.07	0.11	0.0980 J,AP
181	AIR2-10012011	10/1/2011	215	1875	402,945.0	0.07	0.11	0.0077 AP
182	AIR3-10012011	10/1/2011	212	1849	391,181.0	0.07	0.11	0.0104 AP
183	AIR4-10012011	10/1/2011	N/A	N/A	392,987.0	0.07	0.11	ND
184	AIR1-10042011	10/4/2011	213	1434	304,759.5	0.07	0.11	ND
185	AIR2-10042011	10/4/2011	222	1436	319,391.1	0.07	0.11	ND
186	AIR3-10042011	10/4/2011	205	1439	295,314.6	0.07	0.11	ND
187	AIR1-10052011	10/5/2011	215	1433	308,003.9	0.07	0.11	0.0076 J,AP
188	AIR2-10052011	10/5/2011	222	1452	322,432.9	0.07	0.11	0.0056 J,AP
189	AIR3-10052011	10/5/2011	223	1434	319,295.9	0.07	0.11	0.0022 J,AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR1-10012011

GC Semivolatiles

Lot-Sample #...: H1J040409-001 **Work Order #...:** MMXGK1AA **Matrix.....:** AA
Date Sampled...: 10/01/11 **Date Received..:** 10/04/11
Prep Date.....: 10/04/11 **Analysis Date..:** 10/06/11
Prep Batch #...: 1277054
Dilution Factor: 12.69 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.055	ug/m3
Aroclor 1221	ND	0.025	ug/m3
Aroclor 1232	ND G	0.099	ug/m3
Aroclor 1242	**0.076 AP**	**0.025**	**ug/m3**
Aroclor 1248	**0.022 J,AP**	**0.025**	**ug/m3**
Aroclor 1254	ND	0.025	ug/m3
Aroclor 1260	ND	0.025	ug/m3
Aroclor 1262	ND	0.025	ug/m3
Aroclor 1268	ND	0.025	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	NC,DIL	(60 - 120)
Decachlorobiphenyl	NC,DIL	(60 - 120)

NOTE(S):

NC The recovery and/or RPD were not calculated.

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

J Estimated result. Result is less than RL.

Community Air Monitoring Plan - Data Summary

Date of Data Collection September 30, 2011
Site Weather Conditions Broken Cloud, 51 - 67°F, Predominate wind direction: SW, Afternoon high wind 25 mph
General Site Notes 1) No 15 minute time weighted average was exceeded.
NM = Not Measured

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	39	0.0
Minimum Instantaneous	10	0.0
Maximum Instantaneous	68	0.0
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	37	0.2
Minimum Instantaneous	10	0.0
Maximum Instantaneous	67	0.3
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	37	0.1
Minimum Instantaneous	10	0.0
Maximum Instantaneous	74	0.2
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	38	0.3
Minimum Instantaneous	9	0.0
Maximum Instantaneous	40	0.4
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	30	0.0
Minimum Instantaneous	6	0.0
Maximum Instantaneous	34	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	30	0.2
Minimum Instantaneous	8	0.0
Maximum Instantaneous	35	0.2
AIR-1		
Maximum 15 Minute TWA	41	NM
Minimum Instantaneous	9	NM
Maximum Instantaneous	51	NM
AIR-2		
Maximum 15 Minute TWA	48	NM
Minimum Instantaneous	12	NM
Maximum Instantaneous	96	NM
AIR-3		
Maximum 15 Minute TWA	25	NM
Minimum Instantaneous	0	NM
Maximum Instantaneous	30	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatior Contractor suspends work, identifies source and addresses issue.

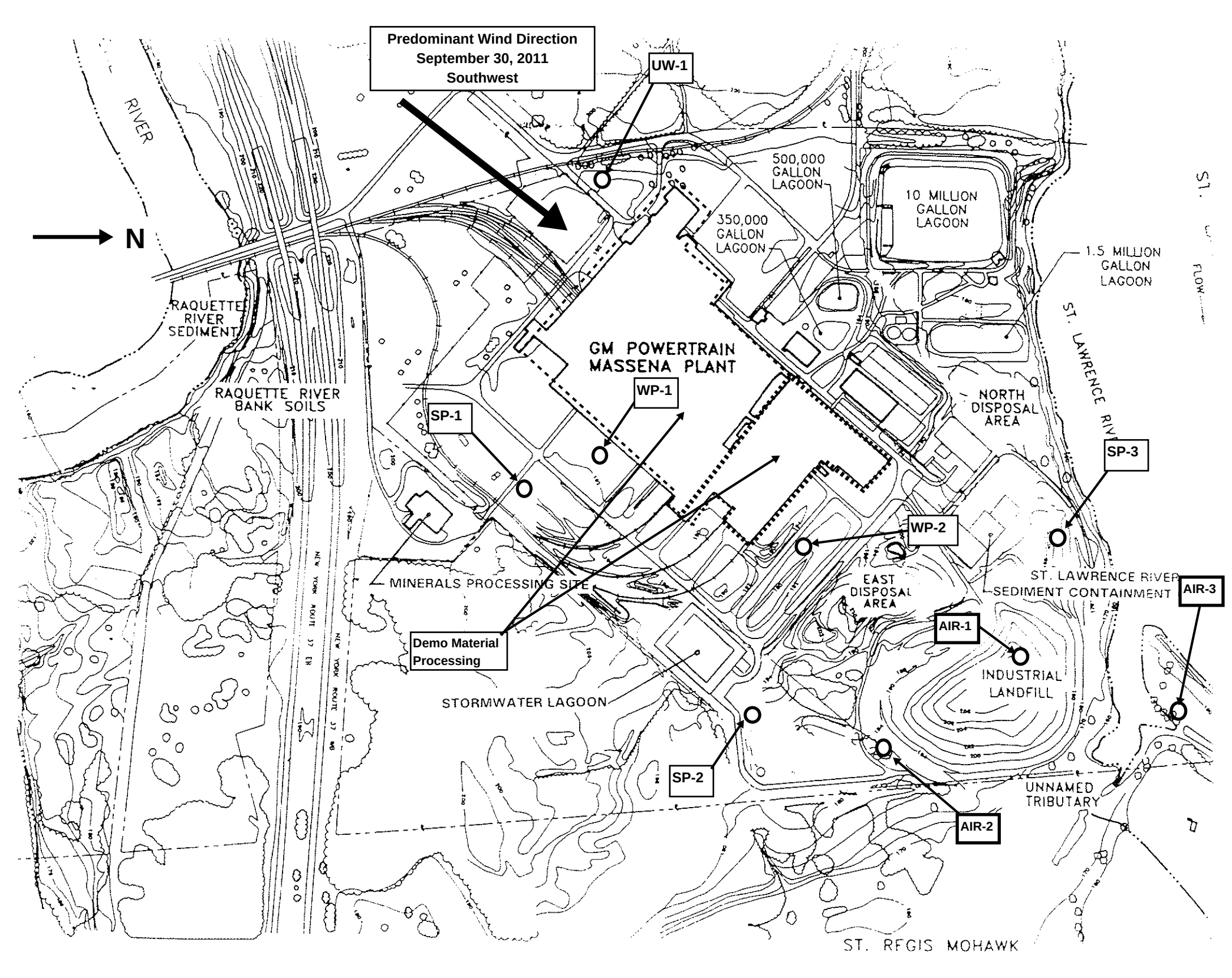
150 µg/m^3 Above background concentrations observed at upwind locatior Contractor stops work, evaluates site activities. Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatior Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatior Contractor stops work, evaluates site activities. Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location. Contractor stops work, implements emission control measures.


Predominant Wind Direction
September 30, 2011
Southwest
N
UW-1
500,000 GALLON LAGOON
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
1.5 MILLION GALLON LAGOON
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
GM POWERTRAIN MASSENA PLANT
WP-1
SP-1
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-3
WP-2
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
SP-2
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK

Community Air Monitoring Plan - Data Summary

Date of Data Collection October 1, 2011
Site Weather Conditions Broken Cloud, 44 - 51°F, Predominate wind direction: N, Morning high wind 18 mph
General Site Notes 1) Instantaneous elevated readings at SP-2 and SP-3 resulted from dry site perimeter roads.
NM = Not Measured 2) Instantaneous elevated readings at WP-1 resulted from smoke generated by torch cutting.
3) No 15 minute TWA was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	19	0.1
Minimum Instantaneous	1	0.0
Maximum Instantaneous	41	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	58	0.5
Minimum Instantaneous	1	0.0
Maximum Instantaneous	275	0.5
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	22	0.1
Minimum Instantaneous	1	0.0
Maximum Instantaneous	32	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	17	0.3
Minimum Instantaneous	2	0.0
Maximum Instantaneous	28	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	21	0.1
Minimum Instantaneous	0	0.0
Maximum Instantaneous	119	0.3
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	27	0.1
Minimum Instantaneous	1	0.0
Maximum Instantaneous	116	0.1
AIR-1		
Maximum 15 Minute TWA	3	NM
Minimum Instantaneous	1	NM
Maximum Instantaneous	4	NM
AIR-2		
Maximum 15 Minute TWA	3	NM
Minimum Instantaneous	1	NM
Maximum Instantaneous	4	NM
AIR-3		
Maximum 15 Minute TWA	6	NM
Minimum Instantaneous	3	NM
Maximum Instantaneous	6	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatior
Contractor suspends work, identifies source and addresses issue.

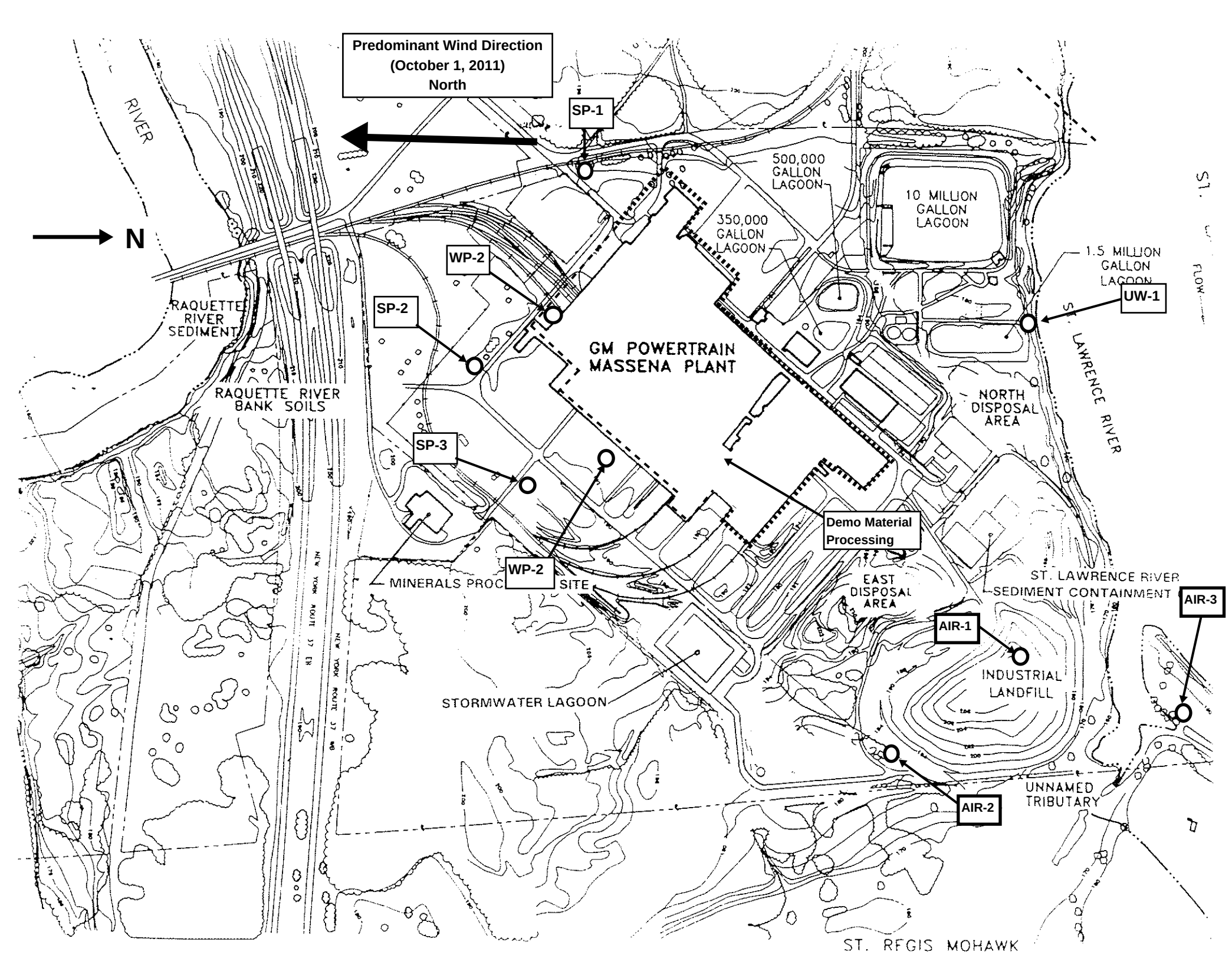
150 µg/m^3 Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatior
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatior
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
(October 1, 2011)
North
N
SP-1
SP-2
SP-3
WP-2
WP-2
UW-1
AIR-1
AIR-2
AIR-3
500,000 GALLON LAGOON
350,000 GALLON LAGOON
10 MILLION GALLON LAGOON
1.5 MILLION GALLON LAGOON
GM POWERTRAIN MASSENA PLANT
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
NORTH DISPOSAL AREA
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
INDUSTRIAL LANDFILL
STORMWATER LAGOON
MINERALS PROC SITE
Demo Material Processing
UNNAMED TRIBUTARY
ST. REGIS MOHAWK
ST. LAWRENCE RIVER
NEW YORK ROUTE 37 ER
NEW YORK ROUTE 37 WB
FLOW

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-09302011-00146 **Date:** September 30, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (3)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (28)
Subcontractors: Heritage (3)
Perras (2)

Weather/Wind: Cloudy 51 to 67° F \ Wind out of the S at 1 to 12 miles per hour. Wind gust at 25 mph. No precipitation during work shift.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Employees performing hammering activity must wear proper hearing protection.
- Workers in Cell #3 must wear proper PPE inside the fenced in area. The PPE includes respirators and Tyvek suits.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with two hydraulic shears.
- Torch cutting in designated burn field on the east side of the building footprint.
- Cleaning pad of dust and housekeeping activity inside and outside of the TSCA exclusion zone.
- Loaded 15 intermodal containers with TSCA debris at door#16.
- Loaded 15 intermodal containers with soil from Cell #3.
- Loaded three HESX rail cars with 15 intermodal containers.
- Established a permanent barrier around the leading edges at the administration building.
- Removing perimeter walls to grade.
- Decontaminating 954 excavator with shear.
- Loaded two BISCO trailer with bailing.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Transporting containers to door #16 for loading of demolition debris. Each load is weighed to calculate soil and debris weights.
- Loaded 3 rail cars with 15 intermodal containers. Manifested by Heritage and inspected by ARCADIS.

Perras

- Driving and tarping loads of TSCA soil from Cell #3 and debris from TSCA exclusion zone under the direction of Heritage

6723 Towpath Road, P.O. Box 66, Syracuse, NY 13214-0066
Tel (315) 446-9120 • Fax (315) 446-5807 • www.arcadis.com • offices nationwide

Waste Materials Removed: Shipped three Heritage rail cars out with 15 intermodal containers to Heritage Landfill in Indiana. Shipped two loads of clean bailing material to Ben Wiesman in Owego, NY.
Samples Collected, Requested/Received Analytical Results: None.
Issues and Concerns: None.
Resolutions to Issues and Concerns: None
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-10012011-00147 **Date:** October 1, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (3)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1530**

Contractor: Brandenburg (19)
Subcontractors: Heritage (3)
Perras (2)

Weather/Wind: Rain 44 to 51° F \ Wind out of the N at 2 to 9 miles per hour. Wind gust up to 18 mph. .28 inches of rain.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Burners must wear proper PPE when torch cutting. The PPE includes clean respirator and green coveralls.
- Operators must perform daily inspections on equipment.
- Employees must dress appropriately for the weather.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with two hydraulic shears.
- Cleaning pad of dust and housekeeping activity inside and outside of the TSCA exclusion zone.
- Loaded 14 intermodal containers with TSCA debris at door#16.
- Loaded 4 AW intermodal containers with TSCA debris at door #16 with a 954 excavator and magnet.
- Loaded 14 intermodal containers with soil from Cell #3.
- Removing perimeter walls to grade.
- Decontaminating 954 excavator with shear.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Transporting containers to door #16 for loading of demolition debris. Each load is weighed to calculate soil and debris weights.
- Loaded 2 rail cars with 14 intermodal containers. Loaded one AW rail car with four 12 ft tall intermodal containers. Manifested by Heritage and inspected by ARCADIS.
- Nine four position railcars with 62 cu yd Allied Waste intermodal containers arrived on site overnight.

Perras

- Driving and tarping loads of TSCA soil from Cell #3 and debris from TSCA exclusion zone under the direction of Heritage

6723 Towpath Road, P.O. Box 66, Syracuse, NY 13214-0066
Tel (315) 446-9120 • Fax (315) 446-5807 • www.arcadis.com • offices nationwide

Waste Materials Removed: No material left site.
Samples Collected, Requested/Received Analytical Results: None.
Issues and Concerns: Allied Intermodal containers would not fit through scale house.
Resolutions to Issues and Concerns: Low deck trailers is going to be used for transporting AW containers.
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

6723 Towpath Road, P.O. Box 66, Syracuse, NY 13214-0066
Tel (315) 446-9120 • Fax (315) 446-5807 • www.arcadis.com • offices nationwide

RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: **10/19/2011**

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 10/10/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:42 am on 10/10/11 to 7:23 am on 10/11/11 from Air Station #2.

Analytical Result (or measurement): 0.081 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This near exceedance is from Air Station #2 located on east perimeter fence of the site collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers Brandenburg work activities for day and evening on 10/10/11 and early morning of 10/11/11. At cell #3, Brandenburg loaded PCB-containing soil into 19 intermodal containers on 10/10/11. Air monitoring station #2 is downwind and east approximately 850-feet away from where the loading in cell #3 occurred. On 10/10/11, the wind was primarily out of the southwest in the morning and predominantly out of the northwest in the afternoon. Average wind speeds around 3-5 mph with gusts as high as 17 mph.

Brandenburg Representative Notified: *John Williams*

Date: 10/19/2011 *Time:* 2:35 PM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack*

Date: 10/19/2011 *Time:* 1:35 PM

Immediate Action(s) Required: ____ *Yes* **X** *No* *Continue with existing established actions.*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedances and near exceedances:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.

2). Covering the soil pile sooner with the onset of a storm.

3). Increased watering of the piles and/or roadway.

4). Erect a wind sock near soil pile load-out area to better identify the wind gusts.

5). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.

6). Obtained software upgrade for the weather station to notify via email and audio alarm in the event of sustained high winds.

7).ARCADIS will notify Brandenburg to shut down when sustained winds greater than 15 mph are occurring.

8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).

9). Collection of additional NIOSH 5503 for PCBs in air at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant.

10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these short term actions will continue. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedances to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 10/19/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
168	AIR1-09272011	9/27/2011	218	1369	298,050.5	0.07	0.11	0.0209 AP
169	AIR2-09272011	9/27/2011	213	1347	287,217.7	0.07	0.11	0.0109 AP
170	AIR3-09272011	9/27/2011	250	1343	335,544.5	0.07	0.11	0.0050 J,AP
171	AIR1-09282011	9/28/2011	223	1451	323,291.3	0.07	0.11	0.0023 J,AP
172	AIR2-09282011	9/28/2011	222	1408	313,174.0	0.07	0.11	ND
173	AIR3-09282011	9/28/2011	219	1443	316,471.3	0.07	0.11	0.0017 J,AP
174	AIR1-09292011	9/29/2011	222	1409	312,102.7	0.07	0.11	0.0021 J,AP
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186	AIR3-10042011	10/4/2011	205	1439	295,314.6	0.07	0.11	ND
187	AIR1-10052011	10/5/2011	215	1433	308,003.9	0.07	0.11	0.0076 J,AP
188	AIR2-10052011	10/5/2011	222	1452	322,432.9	0.07	0.11	0.0056 J,AP
189	AIR3-10052011	10/5/2011	223	1434	319,295.9	0.07	0.11	0.0022 J,AP
190	AIR1-10062011	10/6/2011	218	1429	310,837.0	0.07	0.11	0.0022 J,AP
191	AIR2-10062011	10/6/2011	226	1429	322,888.6	0.07	0.11	ND
192	AIR3-10062011	10/6/2011	209	1434	299,396.9	0.07	0.11	ND
193	AIR1-10072011	10/7/2011	211	1437	303,745.7	0.07	0.11	0.0119 AP
194	AIR2-10072011	10/7/2011	221	1437	318,091.4	0.07	0.11	0.0104 J,AP
195	AIR3-10072011	10/7/2011	215	1432	307,798.3	0.07	0.11	0.0035 J,AP
196	AIR1-10072011B	10/7/2011	208	586	122,148.8	0.07	0.11	0.2760 AP
197	AIR2-10072011B	10/7/2011	218	586	128,030.5	0.07	0.11	0.0189 AP
198	AIR3-10072011B	10/7/2011	208	582	120,989.3	0.07	0.11	0.0400 AP
199	AIR1-10082011	10/8/2011	205	1286	263,347.3	0.07	0.11	0.2130 AP
200	AIR2-10082011	10/8/2011	215	1284	275,853.5	0.07	0.11	0.0193 AP
201	AIR3-10082011	10/8/2011	201	1277	256,096.5	0.07	0.11	0.0570 AP
202	AIR1-10112011	10/11/2011	213	1448	307,900.6	0.07	0.11	0.058 J,AP
203	AIR2-10112011	10/11/2011	215	1421	305,310.1	0.07	0.11	0.081 AP
204	AIR3-10112011	10/11/2011	218	1431	312,532.9	0.07	0.11	0.0129 AP
205	AIR4-10112011	10/11/2011	N/A	N/A	300,400.9	0.07	0.11	ND
206	AIR1-10122011	10/12/2011	212	1411	298,438.7	0.07	0.11	0.0029 J, AP
207	AIR2-10122011	10/12/2011	211	1425	300,611.0	0.07	0.11	0.0024 J,AP
208	AIR3-10122011	10/12/2011	193	1388	268,057.8	0.07	0.11	ND
209	AIR1-10132011	10/13/2011	208	1421	295,743.3	0.07	0.11	0.0196 AP
210	AIR2-10132011	10/13/2011	209	1428	298,408.4	0.07	0.11	0.0104 J,AP
211	AIR3-10132011	10/13/2011	191	1423	271,969.4	0.07	0.11	0.0072 J,AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

ARCADIS U.S. Inc

Client Sample ID: AIR2-10112011

GC Semivolatiles

Lot-Sample #...: H1J120410-002 **Work Order #...:** MM43V1AA **Matrix.....:** AA
Date Sampled...: 10/11/11 **Date Received..:** 10/12/11
Prep Date.....: 10/12/11 **Analysis Date..:** 10/14/11
Prep Batch #...: 1285045
Dilution Factor: 8.19 **Method.....:** EPA-2 TO-4A

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Aroclor 1016	ND G	0.045	ug/m3
Aroclor 1221	ND	0.016	ug/m3
Aroclor 1232	ND G	0.081	ug/m3
Aroclor 1242	**0.062 AP**	**0.016**	**ug/m3**
Aroclor 1248	**0.019 AP**	**0.016**	**ug/m3**
Aroclor 1254	ND	0.016	ug/m3
Aroclor 1260	ND	0.016	ug/m3
Aroclor 1262	ND	0.016	ug/m3
Aroclor 1268	ND	0.016	ug/m3

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Tetrachloro-m-xylene	101	(60 - 120)
Decachlorobiphenyl	117	(60 - 120)

NOTE(S):

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection October 10, 2011
Site Weather Conditions Sunny, 59 - 73°F, Predominate wind direction: SW, Morning high wind 17 mph
General Site Notes
NM = Not Measured

1) Elevated readings recorded at all monitoring stations from humid and hazy conditions throughout the early morning hours. Readings back to normal conditions by late morning.
2) Instantaneous elevated reading at WP-2 resulted from dry sire perimeter roads.
3) No 15 minute time weighted average was exceeded.

CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	69	0.4
Minimum Instantaneous	29	0.0
Maximum Instantaneous	89	0.5
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	68	0.3
Minimum Instantaneous	30	0.0
Maximum Instantaneous	95	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	82	0.4
Minimum Instantaneous	28	0.0
Maximum Instantaneous	104	0.4
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	62	0.3
Minimum Instantaneous	25	0.0
Maximum Instantaneous	78	0.3
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	56	0.1
Minimum Instantaneous	19	0.0
Maximum Instantaneous	58	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	60	0.4
Minimum Instantaneous	23	0.0
Maximum Instantaneous	65	0.4
AIR-1		
Maximum 15 Minute TWA	71	NM
Minimum Instantaneous	26	NM
Maximum Instantaneous	74	NM
AIR-2		
Maximum 15 Minute TWA	63	NM
Minimum Instantaneous	29	NM
Maximum Instantaneous	71	NM
AIR-3		
Maximum 15 Minute TWA	69	NM
Minimum Instantaneous	20	NM
Maximum Instantaneous	72	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatic
Contractor suspends work, identifies source and addresses issue.

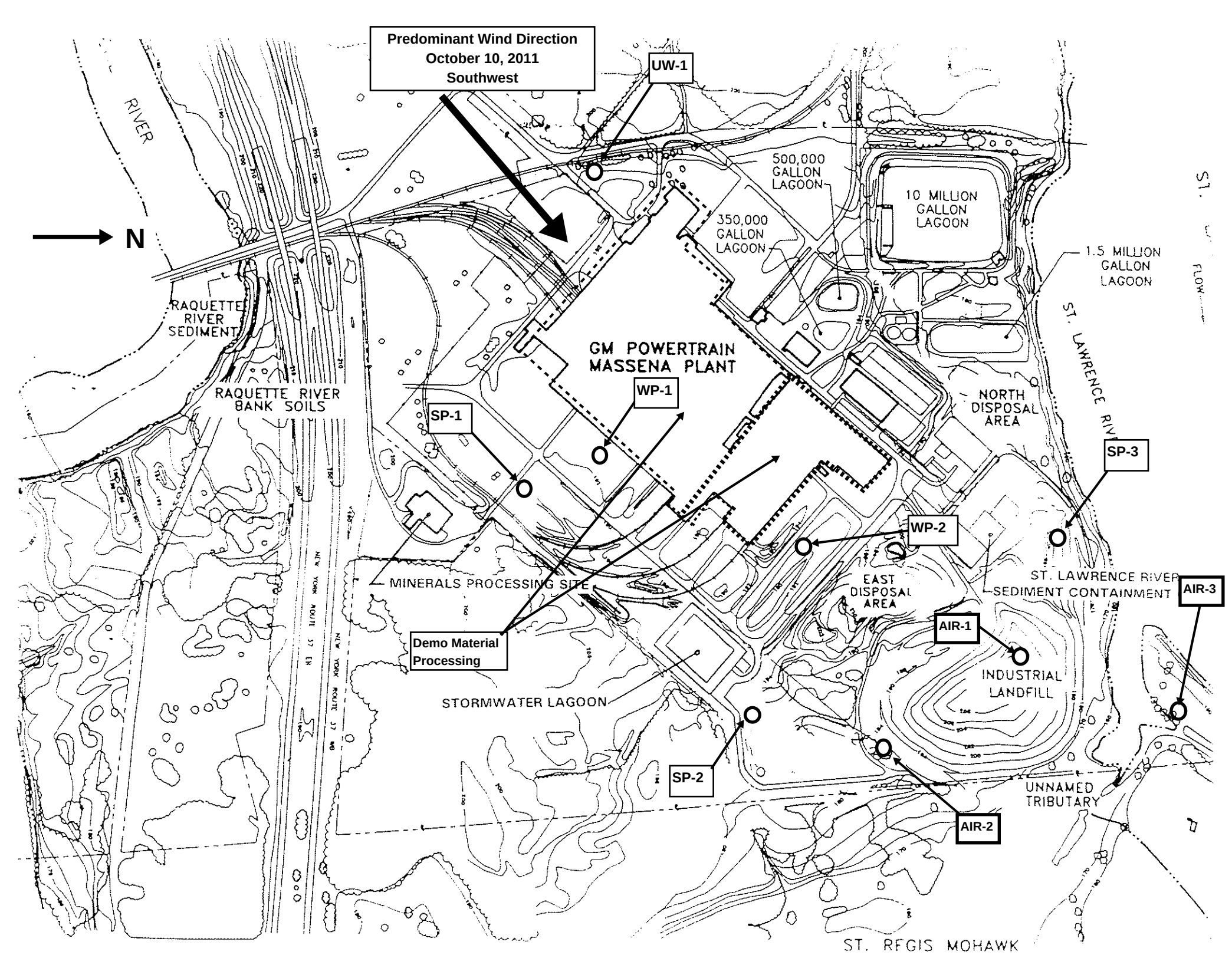
150 µg/m^3 Above background concentrations observed at upwind locatic
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m³ above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatic
Contractor suspends work until concentrations return to <5 ppm above background.

>5 ppm and <25 ppm Above background concentrations observed at upwind locatic
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.

>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
October 10, 2011
Southwest
N
UW-1
500,000 GALLON LAGOON
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
1.5 MILLION GALLON LAGOON
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
GM POWERTRAIN MASSENA PLANT
WP-1
SP-1
NORTH DISPOSAL AREA
ST. LAWRENCE RIVER
SP-3
WP-2
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
SP-2
UNNAMED TRIBUTARY
AIR-2
ST. REGIS MOHAWK

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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-10102011-00154 **Date:** October 10, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (2)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (26)
Subcontractors: Heritage (3)
Perras (2)

Weather/Wind: Mostly Sunny \ 59 to 79° F \ Wind out of the SW at 0 to 5 miles per hour. Wind gust up to 17 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- The tunnel work has many hazards. Darkness is one of the largest hazards. Areas should be properly lit to perform the work. If they are not, notify your supervisor.
- Operators that are loading subcontracted trucking outfits must make sure that no one is in the cab.

Work Activities Summary:

Brandenburg

- Sizing P&S and #1 clean scrap in the lay down area with one hydraulic shears.
- Loaded 19 HESX intermodal containers with soil from Cell #3.
- Limited torch cutting in designated burn field in AM.
- Wire Stripping operation up and running
- Continued using UP 90 concrete pulverizer and 954 excavator with magnet to process rubble for hard fill crushing operation. The pulverizing up and running by noon.
- Removing piping from large die cast tunnels.
- Slab cleaning is TSCA area. The slab clean is achieved by wetting down with fire hose and sweeping with skid steer attachment in a systematic fashion.
- Loaded BISCO trailers with bailing material.
- Loaded one 100 cu yd trailer with C&D material. One C&D truck
- Pre-treating water generated in tunnel system. (Day 4, Cycle 5)
- Two clean scrap railcars arrived on site.

Heritage

- Rotating intermodal containers to Cell #3 for soil loading. Each load is weighed to calculate soil weights.
- Loaded 3 HESX rail cars with 16 intermodal containers. Manifested by Heritage and inspected by ARCADIS.
- Received 10 HESX railcars with 52 intermodal containers.

Perras

- Driving and tarping loads of TSCA soil from Cell #3 under the direction of Heritage.

6723 Towpath Road, P.O. Box 66, Syracuse, NY 13214-0066
Tel (315) 446-9120 • Fax (315) 446-5807 • www.arcadis.com • offices nationwide

Waste Materials Removed: None
Samples Collected, Requested/Received Analytical Results: Wipe samples collected from 973 loader, United Rental Generator, and Dust Boss.
Issues and Concerns: None.
Resolutions to Issues and Concerns: None
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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RACER TRUST PHASE I DEMOLITION REMEDIAL ACTION PROJECT
EXCEEDANCE / NEAR EXCEEDANCE NOTIFICATION ACTION DOCUMENTATION

Date: 11/16/2011

I. Identification of : ____ ***Exceedance*** **X** ***Near Exceedance***

Environmental Monitoring Parameter:

____ Particulate Dust **x** PCBs in Air ____ VOCs

Date of Exceedance/Near Exceedance : 11/7/2011 ***Time of Exceedance/Near Exceedance:*** 24 hour sample, collected from 7:26 am on 11/7/11 to 7:24 am on 11/8/11 from Air Station #1.

Analytical Result (or measurement): 0.077 ug/m^3 ***Evaluation Action Level:*** 0.07 ug/m3

What was the cause (nature) and location of the exceedance or near exceedance?

This near exceedance is from Air Station #1 located on top of the Industrial Landfill collecting a high volume air sample for PCBs using USEPA Method TO-4a. The sample interval covers Brandenburg work activities for 11/7/11. Brandenburg was loading PCB-containing soil from containment cell #5. Brandenburg loaded a total of 10 intermodal containers on 11/7/11. Air monitoring station #1 was downwind and approximately 220-feet away from where the loading in cell #5 occurred. On 11/7/11, the wind was predominatly out of the south with average wind speeds from 9-13 mph with gusts as high as 24 mph.

Brandenburg Representative Notified: *Mike Massiello & John Williams*

Date: 11/16/2011 *Time:* 6:50 AM

USEPA (or other regulatory agency) Representative(s) Notified: *Dino Zack & Anne Kelly*

Date: 11/15/2011 *Time:* 4:35 PM

Immediate Action(s) Required: ____ *Yes* **X** *No* *Continue with existing established actions.*

II. Corrective Action(s)

Short Term Action Taken:

The following corrective actions have already being taken from the previous exceedances and near exceedances:

1). Management of the soil pile covers to keep the side of the poly exposed to the soil pile face down.
2). Covering the soil pile sooner with the onset of a storm.
3). Increased watering of the piles and/or roadway.
4). Erect a wind sock near soil pile load-out area to better identify the wind gusts.
5). Operational shutdown with sustained winds (more than 15 minutes in duration) greater than 15 mph.
6). Obtained software upgrade for the weather station to notify via email and audio alarm in the event of sustained high winds.
7).ARCADIS will notify Brandenburg to shut down when sustained winds greater than 15 mph are occurring.
8). Set new notification level of 50 ug/M^3 for dust at Air Station 1 and notify Brandenburg if this level is exceeded for potential further action(s).
9). Collection of additional NIOSH 5503 for PCBs in air at 2 locations 1) at the soil pile & 2) on the TSCA floor in the plant.
10). Plot # of intermodal boxes loaded on the same table as the analytical results and plot when the data was received.

All of these short term actions will continue. USEPA and ARCADIS will continue assessment of any exceedances and/or near exceedances to determine whether further action is warranted.

Long Term Action Taken:

III. Verification of Corrective Action(s)

Date of Action: 11/17/2011 *Confirmed by:* *Richard Boelter*

Polychlorinated Biphenyls (PCBs)
High Volume Air Sampling Analytical Results
RACER Trust Facility - 56 Chevrolet Road, Massena, NY 13662
USEPA Method TO-4a

	Sample ID	Sample Date	Flow Rate (L/min)	Total Sample Minutes	Total Volume of Air (L)	PCB Action Levels (ug/m^3)		Analytical Result Total PCBs (ug/m^3)
234	AIR1-10252011	10/25/2011	211	1443	304,264.2	0.07	0.11	0.0244 AP
235	AIR2-10252011	10/25/2011	210	1456	306,184.9	0.07	0.11	0.0112 AP
236	AIR3-10252011	10/25/2011	202	1456	294,535.9	0.07	0.11	0.0116 AP
237	AIR1-10262011	10/26/2011	211	1452	306,096.0	0.07	0.11	0.0107 J,AP
238	AIR2-10262011	10/26/2011	215	1419	304,558.1	0.07	0.11	0.0082 J,AP
239	AIR3-10262011	10/26/2011	208	1419	295,195.4	0.07	0.11	0.0025 J,AP
240	AIR1-10272011	10/27/2011	215	1418	305,396.0	0.07	0.11	0.0013 J,AP
241	AIR2-10272011	10/27/2011	213	1436	306,446.5	0.07	0.11	ND
242	AIR3-10272011	10/27/2011	210	1434	300,716.8	0.07	0.11	ND
243	AIR4-10272011	10/27/2011	N/A	N/A	301,258.4	0.07	0.11	ND
244	AIR1-10282011	10/28/2011	221	1910	422,311.6	0.07	0.11	0.0066 J,AP
245	AIR2-10282011	10/28/2011	221	1926	425,065.2	0.07	0.11	0.0025 J,AP
246	AIR3-10282011	10/28/2011	212	1942	412,652.1	0.07	0.11	0.0029 J,AP
247	AIR1-11012011	11/1/2011	220	1422	312,722.2	0.07	0.11	0.0062 J,AP
248	AIR2-11012011	11/1/2011	215	1425	306,470.4	0.07	0.11	0.0033 J,AP
249	AIR3-11012011	11/1/2011	219	1435	313,587.2	0.07	0.11	0.0031 J,AP
250	AIR1-11022011	11/2/2011	215	1462	314,193.9	0.07	0.11	0.0165 AP
251	AIR2-11022011	11/2/2011	214	1455	311,959.6	0.07	0.11	0.0080 J,AP
252	AIR3-11022011	11/2/2011	209	1442	301,724.5	0.07	0.11	0.0039 J,AP
253	AIR1-11032011	11/3/2011	211	1431	302,259.4	0.07	0.11	0.0279 AP
254	AIR2-11032011	11/3/2011	212	1438	305,056.8	0.07	0.11	0.0067 J,AP
255	AIR3-11032011	11/3/2011	203	1435	290,743.9	0.07	0.11	0.0156 AP
256	AIR1-11042011	11/4/2011	216	1864	402,365.9	0.07	0.11	0.0097 AP
257	AIR2-11042011	11/4/2011	217	1887	409,138.4	0.07	0.11	0.0060 J,AP
258	AIR3-11042011	11/4/2011	210	1886	396,429.8	0.07	0.11	0.0046 J,AP
259	AIR1-11082011	11/8/2011	215	1438	309,075.1	0.07	0.11	0.077 AP
260	AIR2-11082011	11/8/2011	228	1439	328,638.2	0.07	0.11	0.0126 AP
261	AIR3-11082011	11/8/2011	193	1435	276,853.8	0.07	0.11	0.0308 AP
262	AIR1-11092011	11/9/2011	221	1422	314,326.4	0.07	0.11	0.0144 AP
263	AIR2-11092011	11/9/2011	225	1423	319,994.2	0.07	0.11	0.0096 AP
264	AIR3-11092011	11/9/2011	213	1468	312,027.6	0.07	0.11	0.0051 J,AP

Notes/Legend:

1 - Laboratory turn around time (TAT) is 72 hours from laboratory receipt
J = Estimated sample result. Result is less then reporting limit
* = Estimated air volume for Blank sample
ND = Not Detected above laboratory reporting limit
AP = Altered Pattern
N/A = Not Applicable

TESTAMERICA LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

ARCADIS U.S. Inc

Lot #: H1K090405 High Volume PCB Air Monitoring **Date Reported:** 11/14/11

Project Number: B0050081.2011.00222

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: AIR1-11082011					
Sample #: 001 Date Sampled: 11/08/11 07:24 Date Received: 11/09/11 Matrix: AIR					
PCBs in Air					Reviewed
Aroclor 1016	ND G	0.039	ug/m3	EPA-2 TO-4A	
Aroclor 1221	ND	0.0097	ug/m3	EPA-2 TO-4A	
Aroclor 1232	ND G	0.072	ug/m3	EPA-2 TO-4A	
Aroclor 1242	**0.053 AP**	**0.0097**	**ug/m3**	**EPA-2 TO-4A**	
Aroclor 1248	**0.024 AP**	**0.0097**	**ug/m3**	**EPA-2 TO-4A**	
Aroclor 1254	ND	0.0097	ug/m3	EPA-2 TO-4A	
Aroclor 1260	ND	0.0097	ug/m3	EPA-2 TO-4A	
Aroclor 1262	ND	0.0097	ug/m3	EPA-2 TO-4A	
Aroclor 1268	ND	0.0097	ug/m3	EPA-2 TO-4A	

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: AIR2-11082011					
Sample #: 002 Date Sampled: 11/08/11 07:40 Date Received: 11/09/11 Matrix: AIR					
PCBs in Air					Reviewed
Aroclor 1016	ND G	0.0059	ug/m3	EPA-2 TO-4A	
Aroclor 1221	ND	0.0030	ug/m3	EPA-2 TO-4A	
Aroclor 1232	ND G	0.013	ug/m3	EPA-2 TO-4A	
Aroclor 1242	**0.0083 AP**	**0.0030**	**ug/m3**	**EPA-2 TO-4A**	
Aroclor 1248	**0.0043 AP**	**0.0030**	**ug/m3**	**EPA-2 TO-4A**	
Aroclor 1254	ND	0.0030	ug/m3	EPA-2 TO-4A	
Aroclor 1260	ND	0.0030	ug/m3	EPA-2 TO-4A	
Aroclor 1262	ND	0.0030	ug/m3	EPA-2 TO-4A	
Aroclor 1268	ND	0.0030	ug/m3	EPA-2 TO-4A	

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Client Sample ID: AIR3-11082011
Sample #: 003 Date Sampled: 11/08/11 08:12 Date Received: 11/09/11 Matrix: AIR

(Continued on next page)

TESTAMERICA LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: H1K090405 High Volume PCB Air Monitoring **Date Reported:** 11/14/11

Project Number: B0050081.2011.00222

Client Sample ID: AIR3-11082011

Sample #: 003 Date Sampled: 11/08/11 08:12 Date Received: 11/09/11 Matrix: AIR

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
PCBs in Air					Reviewed
Aroclor 1016	ND G	0.015	ug/m3	EPA-2 TO-4A	
Aroclor 1221	ND	0.0036	ug/m3	EPA-2 TO-4A	
Aroclor 1232	ND G	0.029	ug/m3	EPA-2 TO-4A	
Aroclor 1242	**0.021 AP**	**0.0036**	**ug/m3**	**EPA-2 TO-4A**	
Aroclor 1248	**0.0098 AP**	**0.0036**	**ug/m3**	**EPA-2 TO-4A**	
Aroclor 1254	ND	0.0036	ug/m3	EPA-2 TO-4A	
Aroclor 1260	ND	0.0036	ug/m3	EPA-2 TO-4A	
Aroclor 1262	ND	0.0036	ug/m3	EPA-2 TO-4A	
Aroclor 1268	ND	0.0036	ug/m3	EPA-2 TO-4A	

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

AP Altered Pattern

Community Air Monitoring Plan - Data Summary

Date of Data Collection November 7, 2011
Site Weather Conditions Mostly cloudy, 47 degrees F, wind out of the SE, 56% humidity, 0.00 inches of rain
General Site Notes
NM = Not Measured 1) No 15 minute time weighted average was exceeded.

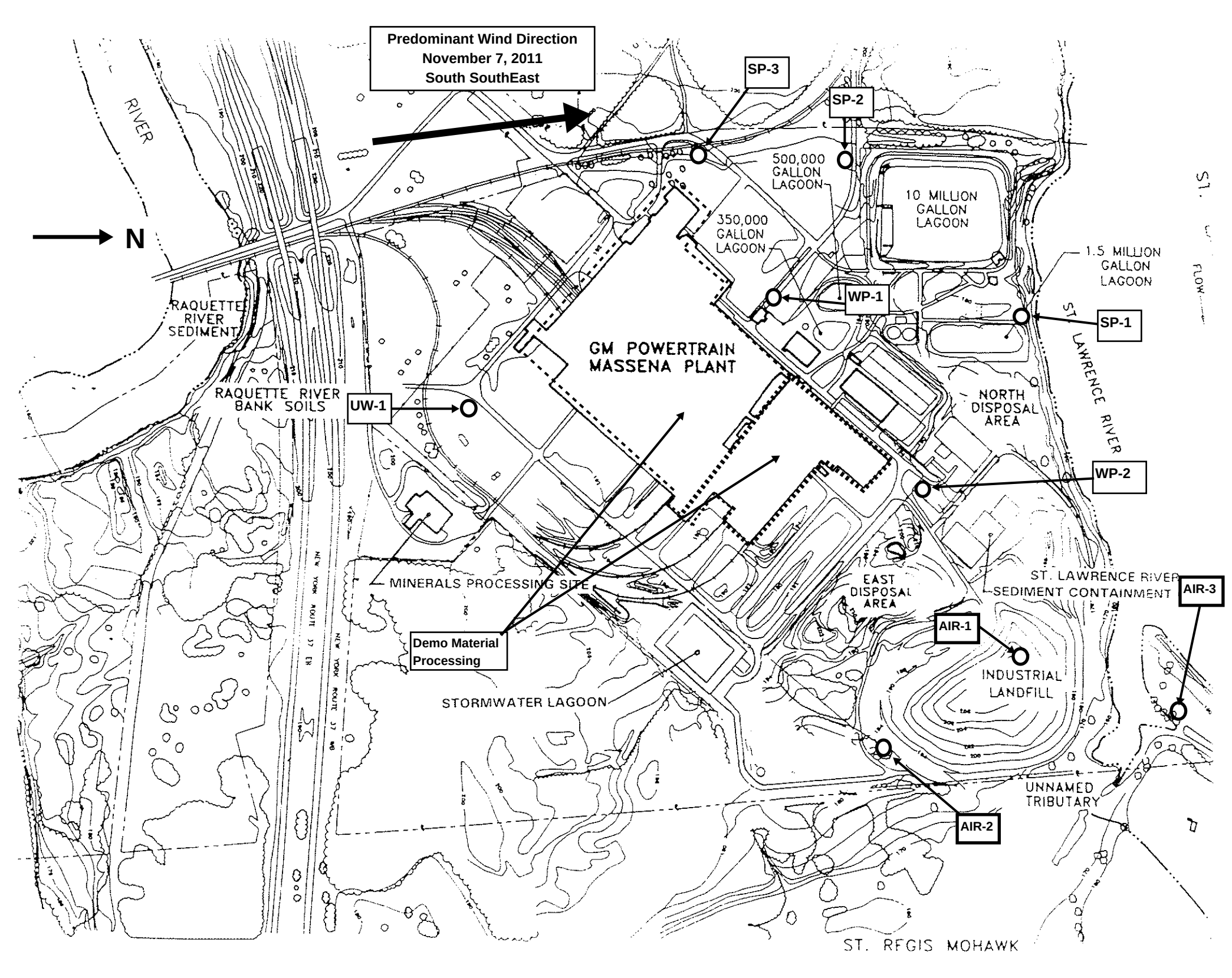
CAMP Monitoring Station ID	Daily Dust Measurements (µg/m3)	Daily Volatile Organic Compound (VOC) Measurements (ppm)
UW-1 (Upwind [background])		
Maximum 15 Minute TWA	22	0.1
Minimum Instantaneous	8	0.0
Maximum Instantaneous	23	0.1
WP-1 (Work Perimeter)		
Maximum 15 Minute TWA	35	0.1
Minimum Instantaneous	7	0.0
Maximum Instantaneous	57	0.4
WP-2 (Work Perimeter)		
Maximum 15 Minute TWA	52	0.2
Minimum Instantaneous	9	0.0
Maximum Instantaneous	145	0.3
SP-1 (Site Perimeter)		
Maximum 15 Minute TWA	46	0.2
Minimum Instantaneous	8	0.0
Maximum Instantaneous	56	0.2
SP-2 (Site Perimeter)		
Maximum 15 Minute TWA	35	0.1
Minimum Instantaneous	4	0.0
Maximum Instantaneous	92	0.1
SP-3 (Site Perimeter)		
Maximum 15 Minute TWA	28	0.1
Minimum Instantaneous	7	0.0
Maximum Instantaneous	190	0.2
AIR-1		
Maximum 15 Minute TWA	24	NM
Minimum Instantaneous	8	NM
Maximum Instantaneous	33	NM
AIR-2		
Maximum 15 Minute TWA	0	NM
Minimum Instantaneous	0	NM
Maximum Instantaneous	6	NM
AIR-3		
Maximum 15 Minute TWA	23	NM
Minimum Instantaneous	9	NM
Maximum Instantaneous	25	NM

Particulate Dust Action Levels (15 minute TWA)

100 µg/m^3 Above background concentrations observed at upwind locatio
Contractor suspends work, identifies source and addresses issue.
150 µg/m^3 Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <150 µg/m^3 above background

VOC Action Levels (15 minute TWA)

5 ppm Above background concentrations observed at upwind locatio
Contractor suspends work until concentrations return to <5 ppm above background.
>5 ppm and <25 ppm Above background concentrations observed at upwind locatio
Contractor stops work, evaluates site activities.
Activities resume only when dust concentrations return to <5 ppm.
>25 ppm Above background concentrations observed at upwind location.
Contractor stops work, implements emission control measures.


Predominant Wind Direction
November 7, 2011
South SouthEast
N
SP-3
SP-2
500,000 GALLON LAGOON
10 MILLION GALLON LAGOON
350,000 GALLON LAGOON
1.5 MILLION GALLON LAGOON
WP-1
SP-1
ST. LAWRENCE RIVER
RAQUETTE RIVER SEDIMENT
RAQUETTE RIVER BANK SOILS
UW-1
GM POWERTRAIN MASSENA PLANT
NORTH DISPOSAL AREA
WP-2
MINERALS PROCESSING SITE
EAST DISPOSAL AREA
ST. LAWRENCE RIVER SEDIMENT CONTAINMENT
AIR-3
AIR-1
Demo Material Processing
INDUSTRIAL LANDFILL
STORMWATER LAGOON
UNNAMED TRIBUTARY
AIR-2
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Daily Field Activity Report

Project: RACER TRUST - Former GM Powertrain Facility **Location: Massena, NY**	**Report No. :** RACER Massena-11072011-00175 **Date:** November 7, 2011 **ARCADIS Project Nos. :** B0050081.2011.00221
IQAT: ARCADIS (3)	**Report By:** Thomas Carey (ARCADIS)

Contractor/Subcontractors (Crew Size) **On Site Work Hours: 0700 – 1730**

Contractor: Brandenburg (19)

Subcontractors: Perras (1)
Heritage (3)

Weather/Wind: Overcast \ 34 to 61 ° F \ Wind out of the South at 9 to 13 miles per hour. Wind gust up to 24 mph. No precipitation.

Health and Safety Meeting Topics:

Daily Health and Safety Meeting topics included:

- Employees must wear proper PPE when working in the cell areas for soil load out and in the small die cast tunnels.
- Heritage drivers must abide by speed limits.
-

Work Activities Summary:

Brandenburg

- Loaded 10 intermodal containers with soil from Cell #5.
- Wash down of small die cast tunnels.
- Pumping water from tunnel leading to oily waste. Pumping water from the ball room of the small die cast tunnel to the pre-treat system.
- Sweeping pad outside TSCA exclusion zone with skid steer.
- Loaded one BISCO trailer with unprepared P&S
- Loaded one United Trailers with Aluminum / Copper / Radiators
- Loaded BISCO flat bed trailer with equipment. (2 Dump Bins, 1 fuel tank, magnet, Hydraulic Hammer, magnet holder, and skid steer with bucket)

Heritage

- Moving intermodal containers from cell # 5 to track 7.
- Weighing intermodal containers to determine the net weight of the soil in each container.
- Loading rail cars with intermodal containers and manifesting.

Perras

- Driving yard truck at direction of Heritage.

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Waste Materials Removed: Shipped one load of Aluminum / Copper / Radiators to United Metals in Cicero Ill. Shipped one load of Unprepared P&S to Morris Iron and Metal in Philadelphia, PA.
Samples Collected, Requested/Received Analytical Results: Collected water sample from pre treatment system, Cycle 8 Day 5 Collected Wipe sample for 924 bucket used in Cell #3.
Issues and Concerns: None
Resolutions to Issues and Concerns: None.
Potential Delays: None determined at this time.
Supplemental Information: • See Brandenburg Daily Log (attached) for additional details of site activities.

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